

City of Kent  
NPDES Phase II Municipal  
Stormwater Permit  
2020 Annual Report



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## Submitted 2020 Annual Report

**Permittee:** KENT CITY OF  
**Permit Number:** WAR045520  
**Water Quality Program**  
**Permit Submittal Electronic Certification**



**Site Address:** 220 4TH AVE S Kent, WA98032

**Submittal Name:** MS4 Annual Report Phase II Western

**Due Date:** 3/31/2021

Number	Permit	Question	Answer
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)	City of Kent SWMP_2021_2_032920 21163357
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b).	City of Kent 2020 Annual Repor_4a_0329202116 3358

5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020	Yes
6	S5.C.1.b.i(a)	List the relevant land use planning efforts that have taken place in your jurisdiction (land use plans that are used to accommodate growth, stormwater management, or transportation). (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	<p>The City of Kent Transportation Master Plan</p> <p>The City of Kent Drainage Master Plan</p> <p>The City of Kent Midway Subarea Plan</p> <p>The City of Kent Comprehensive Plan</p> <p>The City of Kent Shoreline Master Program</p>
7	S5.C.1.b.i(a)	List of stormwater capital projects (currently in or slated for future design and construction) that resulted from this planning. (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	<p>City of Kent 2020 Annual</p> <p>Repor_7_032920211641</p> <p>19</p>

8	S5.C.1.b.i(a)	Describe watershed protection measures associated with stormwater management and land use planning actions that resulted from this planning. (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	<p>The City of Kent Transportation Master Plan was updated in 2020 to reduce the impacts of the city's transportation system on water quality using technology, expanded public transit use and non-motorized transportation options.</p> <p>The City of Kent Drainage Master Plan was prepared to evaluate and recommend drainage facility capital improvement needs to reduce flood risks, improve water quality, enhance fish passage and instream/riparian habitats, and to efficiently serve planned growth.</p> <p>The City of Kent Midway Subarea Plan is a joint strategy between the City of Kent and the City of Des Moines to plan for future growth in the shared community. The plan includes creating an urban form that is environmentally sensitive and sustainable by; promoting environmentally sustainable building design, emphasizing natural drainage systems wherever feasible, and applying landscaping standards that emphasize environmentally sustainable practices.</p> <p>The City of Kent Comprehensive Plan was updated in 2015. The City has adopted policies and development regulations to protect critical areas and enhance a sustainable natural environment, including endangered species and aquatic habitat, air and water quality and large-scale natural resources.</p> <p>The City of Kent Shoreline Master Program was updated in 2019.</p> <p>Kent Design and Construction Standards was updated in 2020.</p>
9	S5.C.1.b.i(a)	Were land acquisitions identified (or are planning ahead for) that are useful for stormwater facilities to accommodate growth or to better serve an existing developed area? (S5.C.1.b.i(a) and (b) ± Required by March 31,	Yes

9a	S5.C.1.b.i(a)	If yes, for what purpose?	The City of Kent continuously evaluates potential land acquisitions to meet strategic goals, accommodate growth, and improve service to existing developed areas. Potential land uses may include flood risk reduction, habitat improvements, and infrastructure improvements, including storm facilities.
10	S5.C.1.b.i(a)	Identified corrective actions, in addition to the minimum requirements of the Municipal Stormwater Permits, to control or treat municipal stormwater discharges that pollute waters of the State (e.g. Limits to impervious cover added to any zoning districts, regional facility planning, minimization of vegetation loss, etc.)? (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	No
11	S5.C.1.b.i(a)	Updates to goals and policies related to investment in stormwater management facilities/BMPs? (yes/no) (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	Yes
11a	S5.C.1.b.i(a)	If yes, briefly describe.	<p>14.09 Flood Hazard Code ± Updated to ensure that it is consistent with the requirements of the Critical Areas Ordinance, KCC 11.06.</p> <p>7.05 Storm and Surface Water Drainage Utility ± Currently being updated to require the use of operational and structural source control BMPs and to require self-inspection of private drainage systems.</p> <p>7.14 Illicit Discharge Code ± Updated to require the use of operational and structural source control BMPs to prevent illicit discharges to the MS4.</p> <p>City of Kent Comprehensive Plan - The City has adopted policies and development regulations to protect critical areas and enhance a sustainable natural environment, including endangered species and aquatic habitat, air and water quality and large-scale natural resources.</p>



12	S5.C.1.b.i(a)	Does the long-range plan identify the location and existing capacity of the stormwater facilities owned or operated by the permittee and show which of those stormwater facilities have unused capacity? (yes/no) (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	No
12a	S5.C.1.b.i(a)	Do these stormwater facility locations impact where housing, or other types of development, are projected to be located or influence the acquisition of land? (if yes, how?)	-NA-
12b	S5.C.1.b.i(a)	Does the long-range plan identify a lack of facilities and the potential impacts of existing or new development to those areas and receiving waters?	No
12c	S5.C.1.b.i(a)	Any new proposed locations and capacities of stormwater facilities needed for the timeframe of the plan?	No
13	S5.C.1.b.i(a)	Based on the projected population densities and distribution of growth over the planning period, describe how stormwater runoff impacts are forecasted. Does stormwater management information (including water quality) direct where growth is directed? (S5.C.1.b.i(a) and (b) ± Required by March 31, 2021 and January 1, 2023)	<p>The Drainage Master Plan is based off the latest population forecasts. Stormwater is modeled accordingly. Improvements are suggested within the plan of where stormwater improvements are warranted. This process does not direct where development occurs.</p> <p>Development is required to conform with Kent's Shoreline Program and fit constraints for water quality and flow control within the area. All development is required to comply with the Kent Surface Water Design Manual which requires further consideration of level of flow control and water quality treatment.</p>
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes

16	S5.C.1.c	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	Yes
16a	S5.C.1.c	If yes, describe the barrier(s) and the measures taken to address them. (S5.C.1.c.i(a))	City of Kent 2020 Annual Repor_16a_032920211 64119
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes
20a	S5.C.2	If yes, list the elements, and the regional program.	The City of Kent adopted elements of the Puget Sound Starts Here regional program. The following elements of the Puget Sound Starts Here campaigns were used in our education and outreach materials, presentations and social media posts; <ul style="list-style-type: none"> <li>• Natural Yard Care</li> <li>• Scoop Every Poop pet waste disposal</li> <li>• Don't Drip and Drip fix car leaks</li> <li>• Drain Rangers children's education and outreach program</li> </ul>
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	City of Kent 2020 Annual Repor_21_0329202116 4232
22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020)	Yes
24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) ± Required by April 1, 2021)	Yes

26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided.	City of Kent 2020 Annual Repor_26a_032920211 64233
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision- making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)	<p>The city creates opportunities for public involvement and participation in the development and implementation of the SWMP Plan primarily by posting documentation online through the city's website and soliciting feedback through public notice. The same procedures will be used to provide for public involvement and participation in the development and implementation of the SMAP. The following are specific ways the public may review and provide comment on Kent SWMP and SMAP documents and activities:</p> <ul style="list-style-type: none"> <li>• The city NPDES Program webpage: <a href="http://www.kentwa.gov/npdes">www.kentwa.gov/npdes</a></li> <li>• In person, during normal business hours, or by appointment</li> <li>• City Council and Public Works Committee Meetings</li> <li>• Telephone and Kent's spill hotline: (253) 856-5600</li> <li>• Mail posted to: City of Kent, Public Works Department, Environmental Engineering, 400 West Gowe, Kent, WA 98032</li> <li>• Email: <a href="mailto:npdes@kentwa.gov">npdes@kentwa.gov</a></li> </ul>
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
28a	S5.C.3.	List the website address in Comments field.	<a href="https://www.kentwa.gov">https://www.kentwa.gov</a>
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?	Yes

30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	Yes
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls size and material(s).	City of Kent 2020 Annual Repor_30a_032920211 64354
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	No
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)	Yes
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)	Yes

33a	S5.C.5	<p>Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.</p>	<p>To ensure that public employees, businesses and the general public are aware of the hazards associated illicit discharges and improper disposal of waste, City staff are trained on these hazards and the preventative BMPs needed. These staff members then meet with members of the public, property owners, and business managers while completing field screenings and private drainage inspections to educate on general hazards associated with illicit discharges, the use of BMPs for pollution prevention and proper waste disposal. These meetings may also be documented as part of the public education and outreach program described in S5.C.2: Public Education and Outreach. All staff training is also documented.</p> <p>Further efforts made by the city toward detection and response education and outreach for the general public include:</p> <ul style="list-style-type: none"> <li>• A spill kit incentive education program was established and implemented as a behavioral change campaign to promote pollution preparedness and spill prevention among local businesses. The Environmental Coalition of South Seattle (ECOSS) provided these inspections for the City of Kent. We will not be renewing our contract for this service in 2021 because we will be focusing on the dumpster lid closure campaign.</li> <li>• In 2020 the city started the development of a regional dumpster lid closure behavioral change campaign that will be implemented in 2021 to prevent illicit discharges into the drainage system from leaking dumpsters.</li> </ul>
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			<ul style="list-style-type: none"> <li>• The City of Kent website has a page to inform the public about stormwater pollution.</li> <li>• Public events are held each year to educate the public about the risks of stormwater pollution. (As allowed by Covid ± 19 restriction).</li> <li>• The city is a partner in the Puget Sound Starts Here! stormwater educational campaign; an initiative to reduce pollution in the Puget Sound, and greater Puget Sound area.</li> </ul>
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non- stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5	Cite field screening methodology in Comments field.	MS4 field screening is implemented by city staff utilizing a methodology that is linked to the operations and maintenance inspections of catch basins, and the inspections of flow control and water quality treatment BMPs; and is comparable to the method recommended in the permit: Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual. Prepared for Washington State Department of Ecology. Herrera Environmental Consultants. May 2013.
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	49

36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.	The percentage of MS4 coverage area screened is determined by the percentage of catch basins in our MS4 inventory that are inspected through our screening process. This does not include private system inspections and screening performed as a result of customer complaints and IDDE screening.
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)	70
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	<p>The city has developed and publicized a spill hotline, telephone number: (253) 856-5600, that is maintained for the public to report suspected spills and illicit discharges. This hotline number is publicized through the following methods:</p> <ul style="list-style-type: none"> <li>• Printed on education and outreach materials such as brochures, door hangers and stickers.</li> <li>• Printed on the back of utility billing envelopes</li> <li>• Posted on city website</li> <li>• Bumper stickers on city vehicles</li> <li>• Posted on social media</li> <li>• Advertised on city hall information sign board</li> <li>• Advertised on city telephone <sup>3</sup>on hold' message</li> </ul> <p>All phone calls received through public works environmental engineering and the spill hotline are logged and documented.</p>
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.	Yes

42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.	City of Kent 2020 Annual Repor_42_0330202109 2402
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)	No
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	0
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	0
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.	33
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential?	No



48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?	Yes
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.	75
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii)	8
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes

55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)	Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?	Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022)	No
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.	Yes
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?	Yes

61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)	Yes
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)	Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	Yes
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	453
63b	S5.C.7.	Number of facilities inspected during the reporting period.	448
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.	53
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.	Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.7.c.iii)	Yes
66a	S5.C.7.	Number of known catch basins?	20025
66b	S5.C.7.	Number of catch basins inspected during the reporting period?	9902
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?	2725

67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c))	Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)	Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d) Required by December 31, 2022)	Yes
69a	S5.C.7.	Cite documentation in Comments.	<ul style="list-style-type: none"> <li>• Appendix 1 of the permit</li> <li>• Washington State Department of Agriculture's Noxious Weed Control NPDES Permit</li> <li>• 2017 City of Kent Surface Water Design Manual</li> <li>• City of Kent Public Works Operations Standard Operating Procedures</li> <li>• Regional Road Maintenance Endangered Species Act Program guidelines</li> <li>• KCC chapter 7.14, Illicit Discharges</li> </ul>
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)	Yes

71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)	Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022.	Yes
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S5.C.8.b.i. (Required by August 1, 2022)	No
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)	Yes
74a	S5.C.8	Number of total sites identified for the inventory.	1118
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).	No
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).	Yes
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.	City of Kent 2020 Annual Repor_77_03292021165726
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.	Not Applicable

79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?	No
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Yes
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	Not Applicable
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9)	Not Applicable
87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)	Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Yes

89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Yes
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Not Applicable
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	0

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Chad Bieren  
 \_\_\_\_\_  
 Signature

3/30/2021 1:40:32 PM  
 \_\_\_\_\_  
 Date

## City of Kent Stormwater Management Program (SWMP) Plan 2021



City of Kent  
Public Works Department  
400 West Gowe Street.  
Kent, WA 98032





# Stormwater Management Program Plan 2021



## INTRODUCTION

The city of Kent (city) is an owner and operator of a regulated municipal separate storm sewer system (MS4) and is therefore required to obtain and maintain coverage under the [Western Washington Phase II Municipal Stormwater Permit](#), a [National Pollutant Discharge Elimination System](#) permit, issued by the [Washington State Department of Ecology](#). Under the terms of S5 of the Western Washington Phase II Municipal Stormwater Permit (permit), the city is required to develop and implement a Stormwater Management Program (SWMP) and report on planned SWMP actions and activities for the upcoming calendar year through a SWMP Plan document.

A new permit was issued July 1, 2019 to be effective August 1, 2019 through July 31, 2024. As such, this document will reflect the City's plans for ongoing compliance with the existing 2019-2024 permit.

Presented here is the city's SWMP Plan, which is organized to generally follow and address all of the subsections of S5 of the permit, which are denoted when appropriate.

Permit background is included in this introduction for context and historical reference.

The city encourages public input in the ongoing development and implementation of this document. Please submit comments or concerns regarding this SWMP Plan by:

Telephone: (253) 856-5500

Email: [npdes@kentwa.gov](mailto:npdes@kentwa.gov)

Mail posted to: City of Kent, Public Works Department, Environmental Engineering, 400 West Gowe, Kent, WA 98032

## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

The National Pollutant Discharge Elimination System (NPDES) is a permit based water quality program implemented under the authority of the Federal Clean Water Act, and administered by the United States Environmental Protection Agency (EPA). The NPDES program is intended to reduce the discharge of pollution to waters of the United States in order to protect and restore waters for "beneficial uses" such as swimming and fishing. Waters of the United States, or waters of the State, when referred to locally in Western Washington, includes streams, lakes, wetlands, Puget Sound, and groundwater. In the State of Washington, NPDES permits are administered by the Washington State Department of Ecology (DOE), the state's water pollution control agency, delegated by the EPA to be responsible for implementing NPDES permits in Washington State. The NPDES permit program covers many different types of discharges; including industrial, construction project runoff, and municipal stormwater.

## NPDES PHASE II MUNICIPAL STORMWATER PERMIT

Under the NPDES municipal stormwater general permit program in Washington State, cities and counties that own or operate MS4's serving a population of more than 100,000 (based on the 1990 Census) are required to be covered under the Phase I permit; and MS4 owners and operators serving populations of 1,000 to 100,000 (based on the 1990 Census) are required to be covered under the Phase II Permit.

Kent is currently covered under the Western Washington Phase II Municipal Stormwater permit, effective August 1, 2019 to July 31, 2024. This new permit issued by the Department of Ecology contains additional permit requirements. Along with these additional requirements, the city is required to continue its compliance obligations and efforts implemented under previous municipal permits.

Principally, the permit requires the city to comply with standards to protect water quality, reduce the discharge of pollutants from the city's stormwater system to the maximum extent practicable (MEP), and meet Washington State's All Known and Reasonable Treatment (AKART) requirements. S5 of the permit requires the city develop and implement a Stormwater Management Program for its jurisdiction's geographic area which must be documented and updated annually as the Stormwater Management Program Plan, and made available to the public through the city's website no later than May 31<sup>st</sup> each year.

In addition to the SWMP Plan, the city prepares an annual report that documents the city's compliance with the permit. Compliance as demonstrated by the annual report will constitute successful implementation of this SWMP Plan. The annual report required for the current permit will be available to the public through the city's website no later than May 31<sup>st</sup> of each year and will cover the reporting period of January 1 through December 31 for the preceding year.



## S5: Stormwater Management Program Plan

The city is intent and creative, while complying with standards and law, in preparing and executing the Stormwater Management Program (SWMP) Plan that is utilized as guidance and reporting both internally and externally. The city also collaborates and coordinates within and throughout city departments, as well as with other permittees to accomplish the SWMP Plan.

This SWMP plan is generally organized to follow and address the required components outlined in S5 of the permit. The new permit requires eight components:

1. Stormwater Planning (S5.C.1)
2. Public Education and Outreach (S5.C.2)
3. Public Involvement and Participation (S5.C.3)
4. MS4 Mapping and Documentation (S5.C.4)
5. Illicit Discharge Detection and Elimination (S5.C.5)
6. Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)
7. Operations and Maintenance (S5.C.7)
8. Source Control Program for Existing Development (S5.C.8)

### S5.C.1: Stormwater Planning

Stormwater Planning is a new program that Permittees are required to implement to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. This program will be implemented in phases according to Permit timelines. The City of Kent has convened an inter-disciplinary team to inform and assist in the development, progress, and influence of this program. The program includes the activities described in this section which is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.1:

- Inter-disciplinary Team (S5.C.1.a.)
- Coordination With Long-range Plan Updates (S5.C.1.b)
- Low Impact Development Code-related Requirements (S5.C.1.c)
- Stormwater Management Action Planning (S5.C.1.d)

#### S5.C.1.a – INTER-DISCIPLINARY TEAM

There are many ways to successfully approach comprehensive stormwater planning in general, and many ways to approach the specific steps required by the Permit. The inter-disciplinary team includes staff who can use their expertise to advise in the planning of stormwater investments and actions to accommodate future growth in a way that emphasizes protection of designated uses and improves receiving water quality and habitat under both existing and anticipated future developed conditions.



### S5.C.1.b – COORDINATION WITH LONG-RANGE PLAN UPDATES

The city will be required to describe how stormwater management needs and protection/improvement of receiving water health are informing the planning update process and influencing policies and implementation strategies in the city. The initiation of this comprehensive stormwater planning requirement is intended to help permittees make informed decisions about how and when to address existing and anticipated flow and water quality problems by:

1. Developing an inventory of basins all or partially inside your jurisdictional boundaries,
2. Using existing information to complete a prioritization of your basins, and assessing data gaps,
3. Identifying catchment areas for planning within priority basins, and
4. Identifying specific approaches to apply within the catchment areas.

The city has already completed an inventory of the stormwater basins that are all or partially inside the city boundaries. In 2021 staff will be working on collecting data needed to complete the basin prioritization.

S5.C.1.c.i – Low Impact Development Code-related

Requirements

The city has adopted the [2016 King County Surface Water Design Manual](#) to comply with NPDES Permit requirements. The 2016 KCSWDM has been approved as an equivalent to the Ecology Manual. As part of the adoption process the city reviewed and revised local development codes, rules, standards, and other enforceable mechanisms to incorporate and require LID principles and LID BMPs. The revisions make LID the preferred approach to site development to provide:

- Measures to minimize impervious surfaces
- Measures to minimize loss of native vegetation
- Other measures to minimize stormwater runoff



### S5.C.1.d – STORMWATER MANAGEMENT ACTION PLANNING

The Stormwater Management Action Plan (SMAP) developed for the catchment areas will include consideration of the following MS4 and complementary strategies at a minimum:

- capital projects including regional facilities
- land acquisition and/or conservation easements
- land use or zoning code adjustments
- new critical area designations
- protected, enhanced, or restored riparian buffers
- enhanced MS4 maintenance
- education and outreach

The City of Kent has until March 31, 2023 to develop a SMAP for at least one high priority catchment area.

## S5.C.2: Public Education and Outreach

The city's stormwater public education and outreach program strives to build awareness and affect change that will ultimately reduce pollutants in stormwater and improve water quality in waters of the state. To accomplish this, the program focuses on providing accessible resources for information, services, and activities that may help people in Kent better understand and cooperate in stormwater best management practices. By promoting understanding and cooperation through this program, the city hopes that a more knowledgeable and engaged community will adopt attitudes and behaviors that decrease detrimental influences on stormwater.

This program is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.2, with subparts denoted when appropriate:

- Build general awareness about methods to address and reduce impacts from stormwater runoff.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

### S5.C.2.a.i – BUILD GENERAL AWARENESS

It is Kent's goal to continue improving awareness and involvement in stormwater management with the general public, businesses, engineers, contractors, developers, land use planners, residents, landscapers, and property managers and owners. The city utilizes local and regional resources, campaigns and programs to provide opportunities for education and stewardship for these target audiences in Kent. The following measures are intended to support information sharing and compel desired action from each audience in the various subject areas surrounding stormwater.

#### S5.C.2.a.i.a – Build General Awareness with the General Public and Businesses

The city supports building general awareness with the general public and businesses in the following subject areas outlined in the permit:

- 1) General impacts of stormwater on surface waters.
- 2) Impacts from impervious surfaces.
- 3) Low impact development (LID) principles and LID best management practices (BMPs).

The city achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below:

- City of Kent 2020 Stormwater Management Program Plan
- City of Kent Drainage Master Plan
- City of Kent Surface Water Design Manual
- Personal interactions (via phone, email, and face-to-face)
- Kent's city website: [www.kentwa.gov](http://www.kentwa.gov)
- Environmental compliance inspections
- Source control inspections
- Fats, oil, and grease (FOG) inspections
- Hazardous Waste Facility Inspections
- Response to private drainage concerns
- Operations and Maintenance activities
- Kent TV21 – Public Works Committee Meetings

- Kent Reporter
- Direct mailings
- Puget Sound Starts Here campaigns
- Social media through Kent's Facebook and Twitter accounts
- Planet Protectors Summit event for school-aged children
- Public Works Appreciation Week Event
- Puget Sound Spill Kit Program
- City Council and Committee Meetings
- Public Land Use Notices
- Neighborhood meetings
- Educational brochures
- Posters and stickers
- Signs posted at ponds and wetlands, and for "No Dumping"
- Storm drain markers
- Kent 101
- Enviroscope presentations at city events, such as "You, Me, We", "Summer's Almost Over" at Kent Station, and the Kent Farmers Market.
- Presentations at Kent Schools

Due to Covid-19 restrictions, public events such as Public Works Appreciation Week Event, You, Me We, Summer's Almost Over and the Kent Farmers Market may be cancelled until restrictions are lifted. We did switch to virtual events when possible to accommodate event attendance. In 2021 we will be hosting a virtual Planet Protectors Summit for students residing in Kent.

### S5.C.2.a.i.b – BUILD GENERAL AWARENESS WITH ENGINEERS, CONTRACTORS, DEVELOPERS AND LAND USE PLANNERS

The city fosters building general awareness with engineers, contractors, developers and land use planners in the three following subject areas in the permit:

- 1) Technical standards for stormwater site and erosion control plans
- 2) LID principles and LID BMPs
- 3) Stormwater treatment and flow control BMPs/facilities

The city achieves compliance with these three subject areas, through the services, activities, and publications listed below.

- City of Kent Stormwater Management Program Plan
- City of Kent Drainage Master Plan
- City of Kent Surface Water Design Manual
- City of Kent Design and Construction Standards
- Personal interactions (via phone, email, and face-to-face)
- Kent's city website: [www.kentwa.gov](http://www.kentwa.gov)
- Direct mailings
- Environmental compliance inspections
- Source control inspections
- Kent Permit Center
- Project plan development and review

- Pre and post-construction meetings
- Construction inspections
- Building inspections
- Erosion and sediment control inspections
- Certified Erosion and Sediment Control Lead (CESCL) training
- WA Department of Ecology LID training courses
- Professional Conferences

#### S5.C.2.a.ii – EFFECT BEHAVIOR CHANGE

The city promotes behavior change with residents, landscapers, property managers/owners, developers, school age children and businesses including home-based and mobile businesses regarding the use of best management practices (BMPs) that protect water quality. These BMPs include:

- Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and other hazardous materials.
- Prevention of illicit discharges.
- Yard care techniques protective of water quality.
- Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings.
- Pet waste management and disposal.
- LID Principles and LID BMPs.
- Stormwater facility maintenance, including LID facilities.
- Dumpster, trash compactor and grease bin maintenance.
- Litter and debris prevention.
- Sediment and erosion control.
- Industry specific source control BMPs
- Locally important, municipal stormwater-related subject area BMPs.

Specifically, the behavior-change the city aims to influence is the proper management and disposal of hazardous materials. Kent promotes and facilitates this desired behavior with the following ongoing opportunities and special events that the city hosts, publicizes, and partners with regional initiatives to accomplish.

- Home hazardous waste collection service for eligible seniors and residents with disabilities
- Kent Recycling and Hazardous Waste Collection Day
- Kent Police Prescription Drug Take-Back Day
- King County Wastemobile Program
- Enforcement of state, county and city laws/codes
- Requiring permits and business licensing
- Source control inspections
- Public Works Week Open House Day
- Kent Green Apartment/Condominium Program
- Fats, oil, and grease (FOG) inspections
- Single family residential environmental compliance inspections
- Hazardous waste facility inspections



In 2021 the city will be implementing a program to effect behavioral changes with business owners and managers with regards to dumpster and outdoor disposal best management practices (BMPs). This program will concentrate on educating property owners/managers on structural and non-structural BMPs that can be used to protect the city's MS4 from illicit discharges. Some of these BMP's include:

- Keeping dumpster and grease bin covered/lids closed
- Replace or repair leaking dumpsters and grease bins
- Clean up spills
- Pick up garbage and litter
- Replace or repair leaking compactors
- Install catch basin inserts
- No cleaning of equipment outside where the waste water can drain to the catch basin
- No disposing of liquids in dumpsters
- Route any leaks and other waste water from dumpsters and compactors to the sanitary sewer system
- Sweep the area before washing
- If wet cleaning is required, block the catch basin or contain all wash water, and discharge to the sanitary sewer system



In 2021 the city will focus on a dumpster lid closure regional campaign. The City of Kent has been working with neighboring jurisdictions to develop the Shut It Campaign. This campaign focusses on educating business staff on the importance of keeping dumpster lids closed to prevent illicit discharges from loose garbage and leaking dumpsters. This regional group worked with a consultant to develop this campaign based on community based social marketing strategies.

#### S5.C.2.a.ii – MEASURE UNDERSTANDING AND ADOPTION OF TARGETED BEHAVIORS

The city continues to examine and reflect on its efforts in public education and outreach, and is dedicated to revising and improving programming through adaptive management. To achieve greater awareness of the effectiveness of the city's public education and outreach program, the city utilizes methods of measurement, such as questionnaires, quizzes, and BMP monitoring. Results are used to evaluate environmental understanding and measure behaviors adopted by individuals and groups. The city uses the valuable information obtained through methods of measurement to review and formulate successful resources for education and outreach. The city then incorporates this into each section of the program.



### S5.C.2.a.iii – CREATE STEWARDSHIP OPPORTUNITIES

The city encourages stormwater stewardship and works to promote stewardship opportunities through local and regional initiatives. Below is a list of ongoing opportunities and special events that the city supports and invites the public to take part in.

- Puget Sound Starts Here campaign
  - Drain Ranger Program
  - Don't Drip and Drive
  - Scoop Every Poop
  - Natural Yard Care
- Community volunteer groups
- Green Kent Partnership
- Kent Adopt-A-Street Program
- Neighborhood Grant Program
- King County Wastemobile program
- Recycling and hazardous waste collection events
- Public Works Week Open House Day
- Kent Green Apartment/Condominium Program
- Storm Drain Markers



### S5.C.3: Public Involvement and Participation

The city encourages and values public engagement in the SWMP and SMAP plans. Public involvement and participation in the SWMP and SMAP will be facilitated through the various means listed below. Furthermore, the city will continue to comply with applicable state and local public notice requirements when developing and updating components of the city's SWMP and SMAP plans.

This section is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.3, with subparts denoted when appropriate:

- Create Opportunities for Public Participation in SWMP and SMAP (S5.C.3.a)
- SWMP Plan and Annual Report on Kent Website (S5.C.3.b)

#### S5.C.3.a – CREATE OPPORTUNITIES FOR PUBLIC PARTICIPATION IN SWMP

The city creates opportunities for public involvement and participation in the development and implementation of the SWMP Plan primarily by posting documentation online through the city's website and soliciting feedback through public notice. The same procedures will be used to provide for public involvement and participation in the development and implementation of the SMAP. The following are specific ways the public may review and provide comment on Kent SWMP and SMAP documents and activities:

- The city NPDES Program webpage: [www.kentwa.gov/npdes](http://www.kentwa.gov/npdes)
- In person, during normal business hours, or by appointment
- City Council and Public Works Committee Meetings
- Telephone and Kent's spill hotline: (253) 856-5600
- Mail posted to: City of Kent, Public Works Department, Environmental Engineering, 400 West Gowe, Kent, WA 98032
- Email: [npdes@kentwa.gov](mailto:npdes@kentwa.gov)

### S5.C.3.b – SWMP PLAN AND ANNUAL REPORT ON KENT WEBSITE

The city will make the SWMP Plan and Annual Report available to the public on Kent's website, [www.kentwa.gov/npdes](http://www.kentwa.gov/npdes), no later than May 31 each year, as required under the permit. The SWMP Plan and annual report will remain available on the website until replaced the following year. Public notice shall be given when the SWMP Plan is online and available for review and comments. A hard copy of the SWMP Plan is also available from the Kent public works department upon request.

### S5.C.4: MS4 Mapping and Documentation

Maps of the city's municipal separate storm sewer system (MS4) assure that illicit discharges and spills can be traced upstream for source detection. Maps also aid in identifying downstream fate of non-stormwater discharges. This information can aid in isolating, diverting, and remediating non-stormwater discharges.

The city's Geographic Information System (GIS) Division maintains an electronic stormwater system database as a visible map layer that depicts all city-owned stormwater system conveyance, stormwater facilities, outfalls, treatment and flow control best management practices (BMPs), and non-groundwater receiving waters. This database is updated regularly to reflect new and altered stormwater infrastructure based upon submittals of map update requests by field staff and as-built plans received from completed construction projects. Associated drainage basin layers and land use information layers have been developed, and can be viewed in conjunction with the other stormwater system elements. In addition, the city's GIS department is in the process of mapping all privately-owned stormwater systems in the city. The mapping of low impact development (LID) facilities began in 2017.

Current city of Kent maps are available to DOE, secondary permittees, and neighboring jurisdictions upon request.

### S5.C.5: Illicit Discharge Detection and Elimination

The city has developed and implemented a program for illicit discharge detection and elimination (IDDE) to effectively prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4. The program includes the activities described in this section which is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.5, with subparts respectfully denoted when appropriate:

- Illicit Discharge Identification (S5.C.5.a)
- Public Information Associated with IDDE (S5.C.5.b)
- Illicit Discharges Ordinance (S5.C.5.c)
- Detection Program (S5.C.5.d)
- Addressing Illicit Discharges (S5.C.5.e)
- Training (S5.C.5.f)
- Recordkeeping (S5.C.3.g)

#### S5.C.5.a - ILLICIT DISCHARGE IDENTIFICATION

Illicit connections and illicit discharges are identified in many ways including; field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information. The IDDE Program includes procedures for identifying and addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

#### S5.C.5.b - PUBLIC INFORMATION ASSOCIATED WITH IDDE

To ensure that public employees, businesses and the general public are aware of the hazards associated illicit discharges and improper disposal of waste, City staff are trained on these hazards and the preventative BMPs needed. These staff members then meet with members of the public, property owners, and business managers while completing field screening to educate on general hazards associated with illicit discharges, the use of BMPs for pollution prevention and proper waste disposal. These meetings may also be documented as part of the public education and outreach program described in S5.C.2: Public Education and Outreach. All staff training is also documented.

Further efforts made by the city toward detection and response education and outreach for the general public include:

- Newly developed education and outreach materials for source control best management practices
- A website has been developed to inform the public about stormwater pollution:

#### [Drainage Utility and Stormwater Management](#)

- Public events are held each year to educate the public about the risks of stormwater pollution.
- The city is a partner in the 'Puget Sound Starts Here' stormwater educational campaign; an initiative to reduce pollution in the Puget Sound, and greater Puget Sound area.



## S5.C.5.c – ILLICIT DISCHARGES ORDINANCE

The regulatory mechanism used to prohibit non-stormwater, illicit connections, and discharges into the city's MS4 to the maximum extent allowable is the Illicit Discharges Ordinance. This ordinance was codified in [Kent City Code \(KCC\) Chapter 7.14](#) – Illicit Discharges, and went into effect July 2, 2009. The ordinance was updated in 2014 and was amended again in 2016 to enhance the city's enforcement ability by allowing criminal charges for egregious cases of contaminants and pollutants being discharged into the MS4. The updated ordinance went into effect in November of 2016.

The ordinance is very specific about what can and cannot be discharged into the city's stormwater system, as described under allowable discharges and conditional discharges. The ordinance also supports actions for compliance through inspections, monitoring, and required use of BMPs to prevent pollutants and non-stormwater from entering the MS4 and waters of the state. A copy of the Illicit Discharges Ordinance is always available to the public [online through code publishing](#), and upon request.

### S5.C.5.c.i – ALLOWABLE DISCHARGES

According to the ordinance, the following types of discharges shall not be considered illicit discharges for the purposes of the code chapter unless the director determines that the type of discharge, whether singly or in combination with others, is causing or is likely to cause pollution of surface water or groundwater.

- Diverted stream flows;
- Rising groundwaters;
- Uncontaminated groundwater infiltration as defined by U.S. Code of Federal Regulations [40 CFR 35.2005\(20\)](#);
- Uncontaminated pumped groundwater;
- Footing and foundation drains discharging clean stormwater only;
- Air conditioning condensation;
- Irrigation water from agricultural sources that is commingled with urban stormwater;
- Springs;
- Water from crawl space pumps discharging clean stormwater only;
- Flows from riparian habitats and wetlands;
- Non-stormwater discharges covered by another NPDES permit;
- Discharges from emergency firefighting activities; or
- Dye testing using environmental friendly products for the purpose of testing or tracing source pollution is allowable but requires verbal notification to the city prior to the time of testing.

### S5.C.5.c.ii – CONDITIONALLY ALLOWABLE DISCHARGES

According to the ordinance, the following types of discharges shall not be considered illicit discharges for the purposes of the code chapter if they meet the stated conditions, unless the director determines that the type of discharge, whether singly or in combination with others, is causing or is likely to cause pollution of surface water or groundwater:

- Potable water, including water from water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be de-chlorinated to a concentration of 0.1 ppm or less, pH-adjusted, if necessary, and in volumes and velocities controlled to prevent re-suspension of sediments in the MS4;
- Lawn watering and other irrigation runoff are permitted but shall be minimized;

- Dechlorinated swimming pool discharges. These discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted, if necessary, and in volumes and velocities controlled to prevent re-suspension of sediments in the MS4;
- Street and sidewalk wash water, water used to control dust, and routine external building wash down that does not use detergents are permitted if the amount of street wash and dust control water used is minimized; or
- Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a stormwater pollution prevention plan reviewed by the city which addresses such discharges.

#### S5.C.5.c.iii – OTHER DISCHARGES

The city shall further assess and respond to any category of the aforementioned discharges identified as a significant source of pollutants to the waters of the State.

#### S5.C.5.c.iv – ESCALATING ENFORCEMENT PROCEDURES & COMPLIANCE STRATEGY

The city's compliance strategy for IDDE may be informal and/or formal depending on the risk level and cooperation of the responsible party.

In many cases, illicit connections and discharges are accidental, and the responsible parties are willing to work with the city to resolve the issue as efficiently as possible. In these cases, the city uses an informal approach to facilitate the abatement of the illicit discharge while providing education and technical assistance to prevent future illicit discharges.

In cases where a responsible party intentionally discharged pollutants or is uncooperative with the city's efforts to abate the illicit discharge, the city will employ a formal approach through the escalating enforcement procedures outlined below:

1. Education of responsible party
2. Reporting to DOE (if warranted)
3. Notice of correction
4. Notice of violation
5. Stop-use Order on offending property ("red tag")
6. Civil infraction or criminal charges pursuant to KCC 1.01.140, depending on the severity of the particular situation's circumstances.
7. Cost recovery

#### S5.C.5.d – DETECTION PROGRAM

The city's detection program for non-stormwater discharges and illicit connections relies heavily on city staff, the public, and those doing business in the city to recognize and report suspected illicit discharges, connections, and spills. Detection is achieved by training staff, having an informed and attentive public using a spill hotline, and through field screening.



#### S5.C.5.d.i – FIELD SCREENING

MS4 field screening is implemented by city staff utilizing a methodology that is linked to the operations and maintenance inspections of catch basins, and the inspections of flow control and water quality treatment BMPs; and is comparable to the method recommended in the permit: [Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual. Prepared for Washington State Department of Ecology. Herrera Environmental Consultants. May 2013.](#) For additional information regarding the city's field screening method associated with scheduled inspections, refer to chapter S5.C.7 of this document regarding Municipal Operations and Maintenance.

Field screening of the private storm sewer systems of commercial, industrial, and single and multi-family properties in Kent is completed by our Environmental Compliance Inspectors. This field screening methodology is identical to the method used for the MS4 referred to above.

In 2020 the city plans to perform a strategic monitoring program that involves the testing of targeted structures in the city's MS4 located in Kent's industrial and manufacturing areas. The objective is to screen for illicit discharges and connections in areas determined through analysis of Kent's documented history of illicit discharges and types of businesses that have a high potential for the discharge of pollutants.

Pursuant to the obligations of the permit, the city conducted field screening on 40% of the MS4 by December 31, 2017, and are required to conduct an average of 12% per year thereafter. In 2020 city staff conducted field screening on 49% of the MS4.

#### S5.C.5.d.ii – SPILL REPORTING HOTLINE

The city has developed and publicized a spill hotline, telephone number: (253) 856-5600, that is maintained for the public to report suspected spills and illicit discharges. This hotline number is publicized through the following methods:

- Printed on education and outreach materials such as brochures, door hangers and stickers.
- Printed on the back of utility billing envelopes
- Posted on city website
- Bumper stickers on city vehicles
- Posted on social media
- Advertised on city hall information sign board
- Advertised on city telephone "on hold" message

All phone calls received through public works environmental engineering and the spill hotline are logged and documented.





## S5.C.5.f– DETECTION AND RESPONSE EDUCATION AND OUTREACH

The city provides staff members with ongoing training for illicit discharge and/or illicit connection detection and response. The goal is to train all staff, who as part of their normal job responsibilities, might come into contact with, or observe an illicit discharge/connection, on the proper procedures for reporting and responding to suspected and found illicit discharges/connections. Staff members also receive follow-up training as needed to address changes in procedures, techniques, requirements, or staffing. Furthermore, these trainings are documented in relation to S5.C.5.g.



## S5.C.5.e – ADDRESSING ILLICIT DISCHARGES

The city utilizes the DOE recommended manual, *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual, May 2013*, in developing its ongoing program designed to address illicit discharges, including spills and illicit connections.

The response to illicit discharges depends on many factors, including location, magnitude, and type of spill or discharge. Kent has developed and implemented a plan to respond to all suspected spills and illicit discharges; the city's Spill and Illicit Discharge Response Plan was updated in 2020 to meet the requirements and format described in Appendix 12 of the current 2019-2024 Permit.

The updates include easy-to-follow spill response flow charts used to characterize and respond to spills including phone numbers of the appropriate contacts for reporting the spill. An improved process for re-stocking spill kits was implemented which involves the City mechanics inspecting the spill kits during maintenance checks to ensure that the spill kits are fully stocked. An area at our Public Works Operations Facility was set aside to store spill kits and materials in one easy to access area which is clearly marked and includes educational materials. The city trains staff to use this plan and use the following procedures and timelines as required by the permit:

- Procedures for the characterization and abatement of any public or environmental threat posed by illicit connections/discharges (S5.C.5.e.i)
- Procedures and methods for tracing the source of an illicit discharge (S5.C.5.e.ii)
- Procedures for eliminating spills and illicit discharges (S5.C.5.e.iii)
- Minimum response timelines (S5.C.5.e.iv)

#### S5.C.5.e.i – CHARACTERIZING THREATS TO THE MS4 AND ENVIRONMENT

In 2020 City staff updated its response procedures for characterizing a threat to the MS4, human health, and the environment in the Illicit Discharge and Spill Response Plan (Appendix I). The plan describes whether the discharge must be immediately contained, precautions to take, mitigation measures, and it describes the steps that must be taken for the containment of the discharge.

##### S5.C.5.e.ii – Source Tracing Methods

Source tracing is often necessary to identify the origin of a spill or illicit discharge, understand the impact on the city's MS4, determine responsibility for cleanup costs, and prioritize procedural actions.

Below is a list of common source tracing methods used in the city of Kent. This is not a comprehensive list, but a list of the most frequently used techniques. This list is not in any particular order, but is intended to be used as guidance. It is understood that each incident is unique, and may require the use of different source tracing methods. Dye

testing, video inspection, and smoke testing are more advanced methods, and may be used once a determination is made about their appropriateness at each specific site.

#### **Field Exploration**

In some cases the source of a spill can be found in close proximity to the discharge point. A brief examination of the area may help to identify the potential source of the discharge.

#### **Maps and GIS**

The city has extensive GIS layers depicting the sanitary and storm sewer systems, as well as inventoried wetlands, other sensitive areas, drainage basins, and past spills within the city. This information will aid in the inspection and abatement of illicit discharges.

#### **Manhole Linking**

Manholes can be opened for visual inspection to trace discharge sources, working up the 'trunk,' from the discharge detection point, up to the next upstream manhole, analogous to 'connecting the dots.'

#### **Dye Testing**

When a sanitary sewage conveyance is suspected of being illegally connected to the storm sewer system, dye can be used to tint water color. For example; when a toilet is flushed with dye added, and it is connected to the storm sewer, the dyed water is visible as it runs into and through the storm system if there is an illicit connection. Contact public works environmental engineering staff before dye testing for illicit connections.

#### **Video Inspection**

The city has a video-inspection team that is equipped to specifically inspect city storm and sanitary sewer systems for cracks, leaks, misconnections, and blockages. This service can be used when there are inspection issues (private property, inaccessible conveyance, etc.).

#### **Smoke Testing**

If an illicit connection or a crack in the storm sewer system is suspected, smoke testing can be used to trace the location of the crack or connection. This source-detection procedure often requires the temporary blockage of the storm system (to cause smoke to exit cracks rather than the storm system), and should not be employed when there is risk of smoke entering an enclosed structure. Contact public works environmental engineering staff before smoke testing for illicit connections.

### **S5.C.5.e.iii – ELIMINATION OF SPILLS AND ILLICIT DISCHARGES**

Kent's IDDE Program and Illicit Discharge and Spill Response Plan address how to appropriately respond and eliminate discharges, procedures for notification of authority and involved parties, and escalating enforcement. Refer to Appendix I and subsection S5.C.5.e.iv.

#### **S5.C.5.e.iv – Minimum Response Timelines**

Compliance with the previous three sections (S5.C.5.e.i, S5.C.5.e.ii, and S5.C.5.e.iii) will be achieved by meeting the following timelines as outlined in permit section S5.C.5.e.iv:

- Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.
- Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge.
- Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.

- Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

#### S5.C.5.f – TRAINING

Similar to subsection S5.C.5.d.iii, the city provides ongoing training for identification, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, and to conduct these activities to staff, businesses, and general public. Follow-up training is provided as needed to address changes in procedures, techniques, requirements, or staffing. All training is documented.

#### S5.C.5.g – RECORD KEEPING

City staff document, track, and maintain records of all activities associated with IDDE in Kent. In 2019 we developed a new data base in Survey 123 to meet the reporting format requirements described in Appendix 12 of the current 2019-2024 Permit.

### S5.C.6: Controlling Runoff from New Development, Redevelopment, and Construction Sites

Kent has an ongoing development review and inspection program to reduce pollutants and stormwater flow rates from new development, redevelopment, and construction site activities. The program applies to all private and public development, including roads.

The program is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.6, with subparts denoted when appropriate:

- Enforceable Mechanisms Addressing Runoff (S5.C.6.a)
- Permitting Process with Site Plan Review (S5.C.6.b)
- Long-term Operation and Maintenance (S5.C.6.c)
- Notice of Intent (NOIs) (S5.6.d)
- Training (S5.6.e)
- Low Impact Development (LID) (S5.C.6.f)
- Watershed-scale Stormwater Planning (S5.C.6.g)

#### S5.C.6.a – ENFORCEABLE MECHANISMS ADDRESSING RUNOFF

Kent utilizes a combination of city codes, city standards, and adopted standards to establish authority and administer requirements for standards to control runoff. These different components for standards and authority are outlined below. Copies of these codes and standards are always available to the public online and upon request.

##### S5.C.6.b – Minimum Requirements

##### S5.C.6.b.i

Kent requires all new development and redevelopment in the city to meet stormwater management standards that are substantively equivalent to the “Minimum Technical Requirements for New Development and Redevelopment” in [Appendix 1 of the permit](#). These standards apply, at a minimum, to all new development and redevelopment projects disturbing a land area of one acre or greater, including projects less than one acre that are part of a larger common plan of development or sale.

## S5.C.6.a.ii – LOCAL REQUIREMENTS

The following local requirements include limitations, and criteria that, when used to implement the minimum requirements in [Appendix 1 of the permit](#) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter [90.48 RCW](#) to apply all known, available and reasonable methods of prevention, control and treatment prior to discharge.

### Surface Water and Drainage Code

The city council finds that the [Surface Water and Drainage Code, KCC 7.05 and 7.07](#), is necessary in order to:

1. Promote sound development policies and construction procedures which respect and preserve the city's watercourses;
2. Minimize water quality degradation and control the sedimentation of creeks, streams, ponds, lakes, and other water bodies;
3. Protect property owners adjacent to developing and developed land from increased run-off rates which could cause erosion of abutting property;
4. Protect downstream owners;
5. Preserve and enhance the suitability of waters for contact recreation and fishing;
6. Preserve and enhance the aesthetic quality of the waters;
7. Maintain and protect valuable groundwater resources;
8. Minimize adverse effects of alterations in groundwater quantities, locations, and flow patterns;
9. Ensure the safety of city and King County roads and rights-of-way; and
10. Decrease drainage related damage to public and private property.

### Design and Construction Standards

[Kent City Code Chapter 6.02, Required Infrastructure Improvements](#), establish that all construction projects within the city adhere to the [2009 City of Kent Design and Construction Standards](#) for two primary reasons:

1. To the extent practicable, to set forth the minimum requirements for specific and consistent requirements for construction of, and improvements to: public and private streets, water utilities, sewer utilities, and storm water utilities; placement and operation of any utilities in rights-of-way; and all excavation and grading in the city. These Standards include procedures for inspection, acceptance, warranty and deviations.
2. To establish uniform criteria to guide the city's own design, construction and improvement of city streets and utilities.

These standards are currently in the process of being updated to ensure compliance with current permit requirements as well as requirements in the upcoming 2019-2024 permit.

### Surface Water Design Manual

The city's current [2017 City of Kent Surface Water Design Manual](#), (KSWDM) requires construction projects within the city to adhere to specific stormwater management standards during all phases; planning and design, construction, and operations and maintenance. The KSWDM requires the following:

- Site planning requirements
- BMP selection criteria
- BMP design criteria
- BMP infeasibility criteria
- LID competing needs criteria
- BMP limitations

The KSWDM adopts, by reference, the [2016 King County Surface Water Design Manual](#) (King Co Manual) through City of Kent Ordinance #4234. Kent's SWDM includes city-specific requirements, many of which are more stringent than those outlined in the King Co Manual. Kent's SWDM requires all development within the city of Kent to utilize stormwater management techniques to achieve a measure of protection equivalent to [Appendix 1 of the permit](#).

#### **Critical Areas Code and Flood Hazard Regulation Code**

Kent's [Critical Areas Code \(KCC 11.06\)](#) and [Flood Hazard Regulation Code \(KCC 14.09\)](#) address the restrictions related to wetlands, flood hazard areas, and other critical areas within the city. These restrictions include stormwater discharge limitations.



### **S5.C.6.b.iii – LEGAL AUTHORITY**

Kent has established the legal authority to inspect and enforce maintenance standards for private stormwater facilities through the above codes and standards, and permitting process.

### **S5.C.6.c – PERMITTING PROCESS WITH SITE PLAN REVIEW**

Kent's permitting process includes site plan review, inspection, and enforcement-capability provisions to ensure projects meet all the minimum and local requirements outlined in S5.C.6.b. The permitting process includes:

- Review of all stormwater site plans for proposed development activities. (S5.C.6.c.i)
- Inspection, prior to clearing and construction, of all known development sites that have a high potential for sediment transport based on definitions and minimum requirements in thresholds found in [Appendix 7 of the permit](#) - *Determining Construction Site Sediment Damage Potential*, and enforcement as necessary based on inspection. (S5.C.6.c.ii)
- Inspection of all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls; and enforcement as necessary based on inspection. (S5.C.6.c.iii)
- Management of maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments every six months, until 90% of the lots are constructed (or when construction has stopped, and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed. (S5.C.6.c.iv)
- Inspection of all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce as necessary based on the inspection. (S5.C.6.c.v)
- Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the presence and records of an established inspection program designed to inspect all sites. (S5.C.6.c.vi)

- A program including a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities. (S5.C.6.c.vii)
- An enforcement strategy implemented to respond to issues of non-compliance. (S5.C.6.c.viii)

#### S5.C.6.d – CONSTRUCTION STORMWATER GENERAL PERMIT

Stormwater runoff from construction sites can carry muddy water, debris, and chemicals into local waterways. Sediment, Chemicals, and debris can harm aquatic life and reduce water quality. The Department of Ecology requires regulated construction sites to get coverage under the Construction Stormwater General Permit (CSWGP). Following the requirements in this permit helps control and reduce water pollution.

The City of Kent makes available a link to the Department of Ecology's information on the Construction Stormwater General Permit that includes the electronic Construction Stormwater General Permit Notice of Intent (NOI) form for construction activity and the Industrial Stormwater General Permit NOI form for industrial activity to representatives of proposed new development and redevelopment. Here is that link: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Construction-stormwater-permit>.

The city will continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

#### S5.C.6.e – CITY STAFF TRAINING

All city staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training is provided as needed to address changes in procedures, techniques or staffing. The city maintains records of the training provided and the staff trained.

### S5.C.7: Operations and Maintenance

The city works diligently to implement maintenance standards for the city's MS4 as well as stormwater facilities regulated by the city. These maintenance standards are developed for efficient conveyance, storage, and treatment of stormwater before it is discharged to surface or ground waters. This helps to reduce localized flooding, decrease instances of erosion, and allow treatment processes to function properly. As a result, the city continues to ensure that these facilities are full-functioning and properly maintained and will prevent and/or reduce stormwater pollution.

This section is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.7, with subparts respectfully denoted when appropriate:

- Maintenance Standards (S5.C.7.a)
- Maintenance of Stormwater Facilities Regulated By The City (S5.C.7.b)
- Maintenance of Stormwater Facilities Owned or Operated by the City (S5.C.7.c)
- Inspections of Flow Control and Treatment Facilities (S5.C.7.c.i)
- Spot Inspections (S5.C.7.c.ii)
- Catch Basin Inspections, Maintenance and Cleaning (S5.C.7.c.iii)
- 95% Minimum Compliance (S5.C.7.c.iv)



- Best Management Practices (S5.C.7.d)
- Stormwater Management Training Program (S5.C.7.e)
- Stormwater Pollution Prevention Plan (S5.C.7.f)
- Maintain Records of Activities (S5.C.7.g)

The information in this section is also used as a training guide to inform public works operations staff and management of the requirements of the permit and how the city fulfills those requirements. The Spill Prevention and Response Standard Operating Procedures were updated in early 2019.

## S5.C.7.a – MAINTENANCE STANDARDS

For all stormwater treatment and flow control BMPs/facilities, catch basins, and inlets, the city adheres to maintenance standards specified in the [2009 City of Kent Design and Construction Standards](#) and [2017 City of Kent Surface Water Design Manual](#). These standards establish criteria for identifying maintenance deficiencies and needs. Maintenance deficiencies are discovered through an inspection process. When an inspection identifies maintenance is needed, the city makes every effort to ensure that maintenance is performed to return the facility to standard within the following timelines:

- Within 6 months for catch basins
- Within 1 year for typical maintenance of facilities, except catch basins
- Within 2 years for maintenance that requires capital construction of less than \$25,000

For each exceedance of the above timeline for maintenance, Kent will document the circumstances and remedy.

## S5.C.7.b – MAINTENANCE OF STORMWATER FACILITIES REGULATED BY THE CITY

Kent verifies long-term operation and maintenance (O&M) of permanent stormwater treatment and flow control BMP's/facilities that are permitted and constructed pursuant to S5.C.6.c.

### S5.C.7.b.i.a – Enforceable Mechanism to Identify Responsible Parties

The city utilizes code and standards (refer to S5.C.6.a) as enforceable mechanisms to identify responsible parties for maintenance of constructed stormwater treatment and flow control BMP's/facilities, and establish enforcement procedures.

Per the [2017 City of Kent Surface Water Design Manual and Kent Design and Construction Standards](#), an executed declaration of stormwater facility maintenance covenant shall exist for all privately owned and maintained stormwater treatment and flow control BMP's/facilities. The covenant identifies the party responsible for maintenance and inspection of stormwater facilities, and also allows right-of-entry for city inspectors. In the absence of a covenant, the city may establish maintenance responsibilities through other legal documentation and means.

### S5.C.7.b.i.b – MAINTENANCE INSPECTION FREQUENCY

Annual inspections will be completed for all stormwater treatment and flow control BMPs/facilities that discharge into the MS4 and were permitted according to the permitting process (refer to S5.C.6.c). Inspection frequency will be performed annually unless there are maintenance records to justify a different frequency.

Inspections of all new permanent stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments shall be inspected every 6 months until 90% of the lots are constructed (or when construction is stopped, and the site is fully stabilized) to identify maintenance needs and enforce compliance with maintenance standards as needed.

All inspection visits and outcomes are documented and recorded. Pursuant to permit obligations, no less than 80% of scheduled compliance inspections shall be completed during this permit period.



### S5.C.7.c – MAINTENANCE OF STORMWATER FACILITIES OWNED OR OPERATED BY THE CITY

The city implements an Operations and Maintenance Program to regulate activities and to conduct maintenance activities to prevent or reduce stormwater impacts.

#### S5.C.7.c.i – INSPECTIONS AND MAINTENANCE OF STORMWATER TREATMENT AND FLOW CONTROL BMPs/FACILITIES

In accordance with permit requirements, the city will annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities, other than catch basins. Inspection frequency will continue to be performed annually unless there are maintenance records to justify a different frequency. All inspection visits are documented and recorded utilizing the inspection checklists (Appendix II) and/or electronic database entry methods.

The city addresses the maintenance deficiencies discovered during the inspection process within the timelines stated in S5.C.7.a. The most common and routine maintenance, such as vegetative maintenance and inlet and outlet structure maintenance, is completed by public works operations staff. However, for facilities that require excessive maintenance, the city may hire contractors to complete the work.



#### S5.C.7.c.ii – SPOT CHECK INSPECTIONS

In the event of a storm with 1.87 inches or more rainfall in 24 hours (known as a 2-year 24-hour event), public works staff perform spot checks of public stormwater infrastructure that have a history of drainage problems, commonly called hotspots. These hotspots are inspected for structural damage and/or localized flooding. Spot checks may be performed for lesser storm events at the discretion of the stormwater utility manager or engineering staff. If spot checks indicate widespread damage or maintenance needs, all treatment and flow control facilities in the area that may have been affected will be inspected and maintenance performed where necessary. Blockages and debris may

be immediately removed if it is safe to do so. This work is done in accordance with all relevant safety and environmental requirements.

The current hotspot inventory includes more than 60 stormwater facility locations within Kent. A map of the hotspot inventory is included in Appendix III for reference purposes only. A fully descriptive list of hotspots is available from public works.

#### **S5.C.7.c.iii – CATCH BASIN AND INLET INSPECTION, MAINTENANCE, AND CLEANING**

Inspections of all publicly owned catch basins and inlets in the city need to be inspected at least once every two years. All inspection visits are documented and recorded utilizing the inspection checklists (Appendix II) and/or electronic database entry methods.

The city addresses cleaning needs and maintenance deficiencies discovered during the inspection process within the timelines stated in S5.C.7.a. The most common and routine maintenance and cleaning is completed by public works operations staff. However, for facilities that require excessive maintenance or cleaning, the city may hire contractors to complete the work.

Catch basins contain a sump that allows sediments to settle out as stormwater passes through. Catch basins must be cleaned of sediments when levels in the sump exceed 60% of sump holding capacity (pursuant to the established maintenance standards (refer to S5.C.7.a). Public works operations staff cleans catch basin sumps either by hand or more commonly using a Vactor truck, a vacuum eductor truck. Decanted water from the Vactor truck is disposed of in accordance with [Appendix 6 of the permit](#), Street Waste Disposal, at permitted sites within Kent.

#### **S5.C.7.c.iv – 95% MINIMUM COMPLIANCE**

Compliance with the requirements in three previous sections, S5.C.7.c.i-iii, shall be achieved with an inspection rate of at least 95%. Weekly inspection reports are generated and sent to all employees responsible for completing inspections. This report helps monitor the inspection achievement rate and prepare work-plans allowing for adequate time and effort toward fulfilling a 95% minimum compliance within the permit timeframe.

#### **S5.C.7.d – BEST MANAGEMENT PRACTICES**

The city makes all known and reasonable efforts through policy, procedure and practices to reduce stormwater impacts associated with runoff from all lands owned and/or maintained by the city, such as parking lots, streets, roads, highways, buildings, parks, open space, and maintenance yards. While performing maintenance activities, Best Management Practices (BMPs) are utilized to prevent stormwater runoff.

Kent is a part of a [Regional Road Maintenance Endangered Species Act Program](#) (RRM/ESA Program). The guidelines of this program provide a set of road maintenance policies and practices that will meet the dual goals of contributing to the conservation of Endangered Species Act listed species, while meeting critical roadway safety and maintenance needs. The RRM/ESA Program guidelines provide detailed information on specific BMPs required during maintenance operations. Training on these guidelines is provided regularly to public works operations staff. Documentation of these activities is maintained when the maintenance activities result in the use of physical BMPs as outlined in the RRM/ESA Program guidelines. Technical assistance on these guidelines is available by calling public works environmental engineering at (253) 856-5500.

The following is a list of maintenance activities that must be addressed pursuant to the permit. A brief description is given of the maintenance activity and typical items of concern during the activity. The activities listed below are all part of routine public works operations intended to ensure a well-maintained and functional infrastructure.

### **Pipe Cleaning and Maintenance**

Storm sewer pipes convey stormwater downstream to alleviate flooding issues. The stormwater discharges to ponds or other stormwater facilities, or often directly to streams, rivers or other water bodies. Storm pipes must be clear of obstructions and breaks to prevent localized flooding, and to minimize the addition of pollutants to water bodies.

Storm pipes are maintained on an as-needed basis; maintenance triggers include localized flooding or inspection reports that document a maintenance need. All sediment, debris, and dirty water are disposed of in a manner protective of the environment and surface water.

### **Culvert Cleaning and Ditch Maintenance**

Ditches are open conveyance systems that collect and convey stormwater from roads and impervious surfaces where a storm pipe is not necessary or feasible (i.e. rural roads). Culverts are relatively short, closed-pipe systems used in a ditch to convey stormwater-runoff under roads and driveways. Culverts may also be used to allow perennial streams to flow unimpeded under roads. It is important to keep ditches and culverts clear of obstructions to prevent localized flooding, minimize the addition of pollutants to water bodies, and prevent damage to culverts, roadways, and the environment.

The city maintains ditches and culverts on an as-needed basis, or as a result of inspection reports that document the need for maintenance. All sediment, debris, and dirty water are disposed of in a manner protective of the environment and surface water.

### **Street Cleaning**

A street sweeping service provider is contracted to perform street sweeping in the city. The contract agreement stipulates sweeper types, a sweeping schedule, and BMPs that must be implemented when sweeping is performed. Swept material is handled by the street sweeping contractor at a permitted facility. The city trains street sweeper drivers on identifying and reporting spills. Water trucks are not used to clean streets.

### **Road Repair and Resurfacing**

Roadways are not only important to transportation, but also convey stormwater. Roadways free of potholes or other deficiencies are important to safe transportation, but also keep sediment and other debris from being washed into the stormwater system and downstream to local waterways and other sensitive areas.

The city maintains roadway surfaces on an as-needed basis, or as part of regularly scheduled roadway improvement projects. For roadway improvement projects, BMPs are a required part of the planning process and are consistent with the requirements of [Appendix 1 of the permit](#). For roadway maintenance spot repair or emergency work, BMPs are utilized to ensure sediment or sediment-laden water is not discharged into catch basins or to surface waters.

### **Snow and Ice Control**

Snow and ice control and removal are important to city operations. Snow and ice accumulation can be controlled by using de-icer. Kent currently uses calcium chloride, as necessary, in concentrations which are approved by DOE and EPA, and with an application technique that won't result in pooling or runoff. Sand is applied to improve traction in areas where snow or ice has already accumulated. Sand is removed as soon as weather and road conditions permit to minimize the transport of sediments to the stormwater system.

### **Utility Installation**

Utility installation is often conducted by public works staff, either as planned improvements or repairs, or as part of emergency repair and replacement. City staff utilize RRM/ESA Program guidelines to select BMPs to ensure that utility installation work does not impact water quality.

Contractors performing utility installation in the city must adhere to Kent standards, which require the use of BMPs for all work that has the potential to impact water quality.

### **Pavement Striping Maintenance**

Pavement striping and striping maintenance are performed so that water quality is not adversely impacted. This includes applying paint striping during dry conditions and ensuring debris from grindings is contained and disposed of properly.

### **Maintenance of Roadside Areas**

Roadway shoulders are maintained for safety reasons and to protect roadway and related infrastructure. Public works operations staff maintains roadway shoulders using means that prevent further damage, such as excessive vegetation removal or activities that could cause erosion. Soil stabilization BMPs are utilized on exposed dirt. For vegetation management, application of fertilizers, pesticides, and herbicides is performed consistent with state law and integrated pest management principles.

### **Dust Control**

Dust from maintenance activities can degrade air quality and, when it settles, dust can reduce the quality of water courses and sensitive areas. Thus, for sites that have the potential to create dust, BMPs must be implemented to reduce the potential of airborne pollution, and must be carefully selected so as not to further cause environmental harm. Urban sources of dust include exposed soils from construction activities and unpaved roads and alleys. BMPs include applying water to exposed soils, encouraging the use of vegetative cover where applicable, and minimizing the amount of soil disturbance.

### **Application of fertilizer, pesticides, and herbicides**

The application of fertilizers, pesticides, and herbicides is performed consistent with state law and integrated pest management principles. The city implemented an Integrated Pest Management (IPM) plan for maintenance operations pertaining to the application of pesticides and herbicides. The IPM plan identifies standard operating procedures for the application of pesticides or herbicides by maintenance crews in both the public works and parks departments. A copy of the IPM is available from public works.

The city is covered as a limited agent under the [Washington State Department of Agriculture's Noxious Weed Control NPDES Permit](#). Under the guidelines, and with reporting requirements, this permit allows for the responsible application of herbicides and pesticides in the vicinity of local water bodies.

Kent is also permitted under the DOE's [Aquatic Mosquito Control General Permit](#); this permit includes requirements for the application of mosquito-targeted pesticides. Application of mosquito larvicide will only occur when specific parameters are met, and with adherence to aquatic mosquito control permit.

### **Sediment and Erosion Control**

Kent requires all maintenance activities and construction sites employ erosion and sediment controls. For projects that disturb soil or maintenance activities that have the potential to pollute, Kent requires the implementation of stormwater pollution prevention BMPs as outlined in the [2017 City of Kent Surface Water Design Manual](#) and [Regional Road Maintenance Endangered Species Act Program](#) guidelines.

**Landscape Maintenance and Vegetation Disposal**

Landscaping is performed in such a way as to minimize exposed soils, to reduce sediment laden runoff, and to encourage infiltration. Vegetation from maintenance activities is collected, and recycled into compost through a contracted waste handler. The IPM plan provides guidance to effectively manage the use of vegetation and pest treatments and controls.

**Trash and Pet Waste Management**

A solid waste service provider is contracted to collect garbage in Kent. The contract requires all solid waste trucks to carry spill kits, and training for drivers on how to respond to and report spills. The contractor must also replace fleet vehicles upon discovery of leaks. The garbage contractor is also required to replace leaking dumpsters within 24 hours.

Kent has full-time staff to collect trash within city right-of-way and mitigate illegal dumping. Staff are trained on the collection and disposal of pet waste on city owned property. City parks that are designated as dog parks provide pet waste bags and garbage cans for the disposal of the waste.

Kent also maximizes recycling in the city through a Conservation Coordinator who implements the solid waste program and promotes recycling education.

**Building Exterior Cleaning and Maintenance**

Cleaning and maintenance activities and requirements for buildings owned and operated by the city of Kent have been outlined in the Operations Facility Stormwater Pollution Prevention Plan. Parks and Recreation staff will continue to receive annual training on proper methods of cleaning and maintaining parks facilities. City-building maintenance activities must comply with the requirements of [KCC chapter 7.14, Illicit Discharges](#).

## **S5.C.7.e – STORMWATER MANAGEMENT TRAINING PROGRAM**

Kent implements an on-going training program for employees whose construction, operations, or maintenance job-functions may impact stormwater quality. The training program addresses the importance of protecting water quality, the requirements of applicable NPDES permits, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns, including potential illicit discharges. Follow-up training is provided as-needed to address changes in procedures, techniques or requirements. Currently, training is held at least twice annually. Kent documents and maintains records of training provided.

## **S5.C.7.f – STORMWATER POLLUTION PREVENTION PLAN**

Kent has developed and implemented a [Stormwater Pollution Prevention Plan](#) (SWPPP) for its Operations, Vector-solids, and East Hill facilities. All structural and operational BMPs listed in the SWPPP are currently being implemented or are scheduled for implementation as soon as practicable. This SWPPP shall be modified and applied at any other sites that meet the need for a SWPPP in the future. The SWPPP includes periodic visual observation of discharges from the facility to evaluate the effectiveness of the BMPs. These facilities are also inspected annually to ensure proper functioning of stormwater infrastructure and implementation of the SWPPP. A copy of the SWPPP is available from the public works department, and on-site at all three locations.



### S5.C.7.g – MAINTAIN RECORDS OF ACTIVITIES

Records of inspections and maintenance or repair activities conducted by the city are maintained in accordance with S9, reporting requirements, of the permit.



### S5.C.8: Source Control Program for Existing development

This is a new program required under the current 2019-2024 permit. The city will begin to implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. This program will include the inspection of publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.

The program is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.8, with subparts denoted when appropriate:

- Source Control Program Elements (S5.C.8.a)
- Minimum Performance Measures (S5.C.8.b)
- Enforceable Mechanisms (S5.C.8.b.i)
- Source Control Program Facility Inventory (S5.C.8.b.ii)
- Source Control Inspection Program (S5.C.8.b.iii)
- Progressive Enforcement Policy (S5.C.8.b.iv)
- Staff Training (S5.C.8.b.v)

## S5.C.8.a – SOURCE CONTROL PROGRAM ELEMENTS

The Source Control Program will need to include the following four elements:

**S5.C.8.a.i** – Application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.

**S5.C.8.a.ii** – Inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.

**S5.C.8.a.iii** – Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by a separate NPDES permit.

**S5.C.8.a.iii** – Practices to reduce polluted runoff from application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.

## S5.C.8.b – MINIMUM PERFORMANCE MEASURES

### S5.C.8.b.i -Enforceable Mechanisms

No later than August 1, 2022, the city will need to adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. Applicable operational source control BMPs will be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, will need to be required by the city for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls.

The city plans to implement a source control education and technical assistance element to this program to assist the business owners/managers and staff in implementing the proper BMPs to prevent stormwater pollution and meet permit requirements.

### S5.C.8.b.ii - Source Control Program Facility Inventory

In 2020, the city established an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory includes:

- (a) Businesses and/or sites identified based on the presence of activities that are pollutant generating.

- (b) Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.

### S5.C.8.b.iii - Source Control Inspection Program

No later than January 1, 2023, Permittees shall implement an inspection program for sites identified pursuant to S5.C.8.b.ii, above.



**S5.C.8.b.iv - Progressive Enforcement Policy**

No later than January 1, 2023, each Permittee shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements.

**S5.C.8.b.v – Staff Training**

The city has trained staff who are responsible for implementing the source control program to conduct these activities. This ongoing training program covers the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training will be provided as needed to address changes in procedures, techniques, requirements, or staff. The city maintains records of the training provided and the staff trained.



## Appendix I: Spill and Illicit Discharge Response Plan

### Introduction

This document outlines actions city staff will take should they encounter a spill or illicit discharge to road surfaces and other city-owned property. Often, city staff may be the first to respond to spills or illicit discharges of potentially hazardous materials. Such incidents can pose a danger to human health and the environment, and must be contained with prompt, decisive actions to minimize the potential danger.

Response to illicit discharges and spills will depend on many factors including quantity, location, and type of pollutant discharged. Spills and illicit discharges are classified accordingly into the following three risk categories: Low; Minor; and Major.

Specific procedures are provided for low and minor spills, and general procedures for major spills. Specific procedures for major hazardous spills are addressed in the [Kent Comprehensive Emergency Management Plan](#). As a general rule, major spills and illicit discharges dictate that the Fire Department is immediately called to take the lead in implementing the appropriate spill response procedures.

The Illicit Discharge and Spill Response Plan will be made accessible at all times. When it comes to spills or discharges of all sizes, every second counts.

### Spill Response Procedures

Follow these steps when responding to a spill:

1. Control - Assess the Situation/Secure the Area
2. Contain the Spill/Illicit Discharge
3. Clean-up the Material
4. Call and Report the Spill/Illicit Discharge
5. Identify Responsible Party
6. Document the Response in See Click Fix for City Records

These steps are detailed as follows and are also outlined in the Spill Response Quick Action Guide & Checklist (Appendix I (a)).

1. Control -Assess the Situation/Secure the Area

Utilize the Risk Characterization Chart (Appendix I (b)) to help assess the level of risk associated with the spill or illicit discharge then proceed appropriately.

If the spill/illicit discharge is “Major”, an unknown material or immanent health risk, immediately call 911. Remain on site to assist Fire Department Hazardous Materials staff with operational issues.

- City employees should only approach a spill or illicit discharge of *known* materials (example: paint, motor oil, diesel or antifreeze). Ensure that the location is safe to enter before approaching, especially if on a roadway open to traffic.

- Ensure safety of city staff and the public by keeping the public and other city staff at a safe distance from the spill/illicit discharge area.
- Apply personal safety equipment including goggles and nitrile gloves. If working in the right-of-way, a reflective safety vest and hard hat will be worn.
- Isolate any ongoing spills or leaks if it is safe to do so. If not, wait for emergency personnel and maintain a safe perimeter.
- Implement traffic control as necessary.
- Call the spill hotline at (253) 856-5600.
- Call your supervisor.
- Call public works, environmental engineering, at (253) 856-5500.

**Attempt to stop an ongoing discharge *only* if it is safe to do so.**

Example 1

When a container of known material has fallen over, the responder could stop the spilling of material by righting the container.

Example 2

Simply turning a valve to stop further release of material.

## 2. Contain the Spill/Illicit Discharge

- Protect yourself first. Wear personal protective equipment (PPE). At a minimum, work boots, eye protection and work/rubber gloves are necessary. If working in the right-of-way, a reflective safety vest will be worn.
- Set up a work zone to safely work within the right-of-way. Consider the location of the spill, traffic volume, time of day, spilled material and quantity, length of time needed to clean up the spill, and employee/public safety.
- If the material is known and non-toxic; place booms, pipe plugs, or other impermeable barriers to prevent the spread of spilled material into the stormwater system, waters of the state, and to pervious surfaces such as soil, grass, or bioswales.

## 3. Clean-up the Material

- a. Contact an outside spill response contractor if the spill is too large to be handled by city operations staff, or if the material is hazardous and needs to be removed from the roadway, ditch, or stormwater system with a vacuum eductor truck.
- Clean-up normally involves the use of granular absorbents, vermiculite, floor sweep, peat moss, absorbent pads and booms.
  - Use absorbent materials to clean up the spilled substance. If the first application of absorbent becomes saturated and will not soak up all of the spilled liquid, a second application may be necessary.
  - Used absorbent materials should be collected and double bagged, and if in the right of way, moved out of the travel lanes and stored at the roadside, preferably well off the shoulder.
  - Absorbent material may be double bagged in heavy-duty trash bags, wrapped or 'diapered' in plastic sheeting, or contained in pails or barrels.
  - The containers used to hold the material should be tagged with the time and date of the spill, and clearly marked to indicate the type of absorbent used and the material that was spilled. It is also desirable to indicate the responsible party if known.
  - Care should be taken not to overload the containers used to store the absorbents. If trash bags are used, double bag and limit each bag to about 15 pounds.
  - If traffic has been stopped to allow the spill response to occur in a safe manner, traffic may resume once spill cleanup has been completed and the travel lanes are safe (i.e. sanded if necessary to provide traction). Before restoring traffic flow, ensure that it will not endanger any remaining cleanup efforts.
  - Spills which have soaked into soil will require cleanup but may be completed at a later date by the responsible party. This process will be initiated after public works environmental engineering staff is notified.

- Contact public works environmental engineering staff for the appropriate disposal method of spent absorbent materials or contaminated soil.



#### 4. Call and Report the Spill/Illicit Discharge

Spill Type	Report to (in this order)
<b>Low Risk</b> Spills can be cleaned up safely by 1 person and have no potential to reach Waters of the State.	Supervisor
	P.W. Environmental Engineering – (253) 856-5500
<b>Minor Risk</b> Spills do not pose a risk to human health or the environment. They have potential to make it to the city's MS4, Waters of the State, and can be cleaned up safely by Public Works Staff.	Supervisor
	Spill Hotline – (253) 856-5600
	P.W. Environmental Engineering – (253) 856-5500
	Washington State Department of Ecology - <b>only if you are unable to contact P.W. Environmental Engineering</b> - (425) 649-7000
<b>Major Risk</b> Spills are composed of hazardous or unknown materials that cannot be safely cleaned up by Public Works Staff.	For hazardous waste contact the fire department – (253) 856-4440
	911
	Spill Hotline – (253) 856-5600
	Supervisor
	P.W. Environmental Engineering – (253) 856-5500
	Washington State Department of Ecology - <b>only if you are unable to contact P.W. Environmental Engineering</b> - (425) 649-7000
	Washington Emergency Management Division - only if you are unable to contact P.W. Environmental Engineering - (800) 258-5990
<b>Private Property</b>	National Response Center - only if you are unable to contact P.W. Environmental Engineering- (800) 424-8802
	If it is a Major Risk call 911 and follow Major Risk instructions.
	Spill Hotline – (253) 856-5600
	P.W. Environmental Engineering – (253) 856-5500
	Washington Emergency Management Division - only if you are unable to contact P.W. Environmental Engineering - (800) 258-5990

For all spill types, please report the following information:

- Your name
- Contact Information
- Date, time, and location of spill
- Weather
- Address of incident
- Responsible Party/Property including contact information if available
- Odor, Clarity & Color
- Description of spill
- Photos of spill (IMPORTANT)
- Pollutant type/Quantity
- Spill destination (Asphalt, private drains, public drains, ditch, wetland, retention pond or stream)
- Current status of incident (e.g. contained, cleaned up, in process etc...)

#### **5. Identify Responsible Party**

- Attempt to identify the party responsible for the spill or illicit discharge through source tracing methods.
- Collect contact information from the responsible party using the Spill Or Illicit Discharge Incident Response Form (Appendix I (c))
- The Responsible Party [RP] is responsible for spilled materials, including the final removal and proper disposal of materials and if needed the subsequent site remediation. If the RP does not or cannot handle this responsibility in a timely manner, the city may initiate disposal and the responsible party may be billed. **Clean-up actions taken by early responders do not affect or limit the RP responsibilities.**

#### **6. Document the Response for City Records**

Public works staff will record the following in the Spill and Illicit Discharge Database:

- Date incident discovered or reported to city
- Date of beginning the response
- Date of end of response
- How was the incident discovered or reported to city?
- Did pollutant discharge to MS4?
- Location of spill/discharge, address if known
- Pollutant type and quantity, if known
- Source tracing approach used
- Source of pollutant and responsible party if known
- Description of incident and has the spill discharged to waters of the state if known
- Caller contact information, unless they wish to remain anonymous
- Is the spill/discharge on public or private property?
- Spill/Illicit discharge respondent
- Correction/elimination methods used
- Who disposed of the materials

## Definitions

For the purposes of this plan, the following definitions apply:

**Absorbent materials:** any materials, manufactured or natural that may be used to absorb spilled fluid, and may include commercial absorbents, saw dust, floor sweep, peat moss, absorbent pads, clay or even topsoil.

**Illicit discharge:** means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from firefighting activities.

**Low risk spills and illicit discharges:** meet all of the following conditions:

1. The spilled material is known.
2. The material spilled is not highly toxic.
3. The quantity spilled is small enough that it can be safely cleaned up using public works spill kits.
4. There is no fire hazard present.
5. The spill can be completely contained and the material has little or no potential to reach the stormwater system or surface waters of the state.
6. If material enters Waters of the State, it is **NOT low risk**, treat as minor or major.

**Major spills and illicit discharges:** hazardous or unknown materials, or spills of a known non-hazardous material larger than can be safely contained and cleaned up by the public works staff. These pose a risk to the responder, the public, or the environment.

**Minor spills and illicit discharges:** do not pose a risk to human health or the environment and have not entered Waters of the State.

**Responders:** include the fire department, contractors, King County employees, Department of Ecology, or trained city personnel.

**Responsible Party (RP):** the entity having dominion over the product prior to the spill, not necessarily the party responsible for the accident.

**Spill:** the expulsion of any fluids or solids upon the roadway itself or the abutting areas that cause an immediate threat to traffic by hindering its normal operation in any way (covering surfaces causing slicks, dripping onto traffic below, etc.) or that may enter the storm drainage system or Waters of the State.

**Waters of the State:** Those waters as defined as “Waters of the United States” in 40 CFR 122.2 within the geographic boundaries of the state of Washington and “waters of the state” as defined in Chapter 90.48 RCW, which includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and water courses within the jurisdiction of the state of Washington.

## Appendix I (a): Spill Response Quick Action Guide & Checklist

### Spill and Illicit Discharge Response Quick Action Guide

#### CONTROL, CONTAIN, CLEAN UP & CALL

##### CONTROL

Assess the Spill or Illicit Discharge - Employees should only approach a Spill or Illicit Discharge of known materials (e.g. paint, motor oil, fuel, antifreeze, and coolants). If unknown or hazardous and cannot be cleaned by City of Kent staff, call 911 immediately! *Refer to flow chart on other side for proper guidance if spill occurs.*

Remember safety first! Protect yourself with personal protective equipment (PPE). Isolate the contaminated area with items such as cones, barricades, rope, and tape. Stop the source of pollution if safe to do so.

##### CONTAIN

Contain the Spill/Illicit Discharge in as small an area as possible.

Build barriers with absorbent socks to keep the spill from spreading.

Protect nearby storm drains, Waters of the State and pervious surfaces such as soil, detention ponds and bioswales with absorbents and impermeable barriers such as heavy duty plastic.

##### CLEAN UP

Clean up the Spill/Illicit Discharge with the following Spill response material:

**Granular, Vermiculite or Similar Sweep up Absorbent** - Absorbs both water-based and hydrocarbon spills.

**Gray Pads & Socks** - Universal - Absorbs both water-based and hydrocarbon spills.

**White Pads & Socks** - Oils, fuels, solvents and petroleum-based products. White pads and socks **repel water!** Ideal for spills in storm drains, lakes, detention ponds, creeks and wetlands.

Spill kits, spill response drum and bulk spill response materials are located in PW Shed Row and Warehouse. Replenish spill kit and spill response drum contents after each spill.

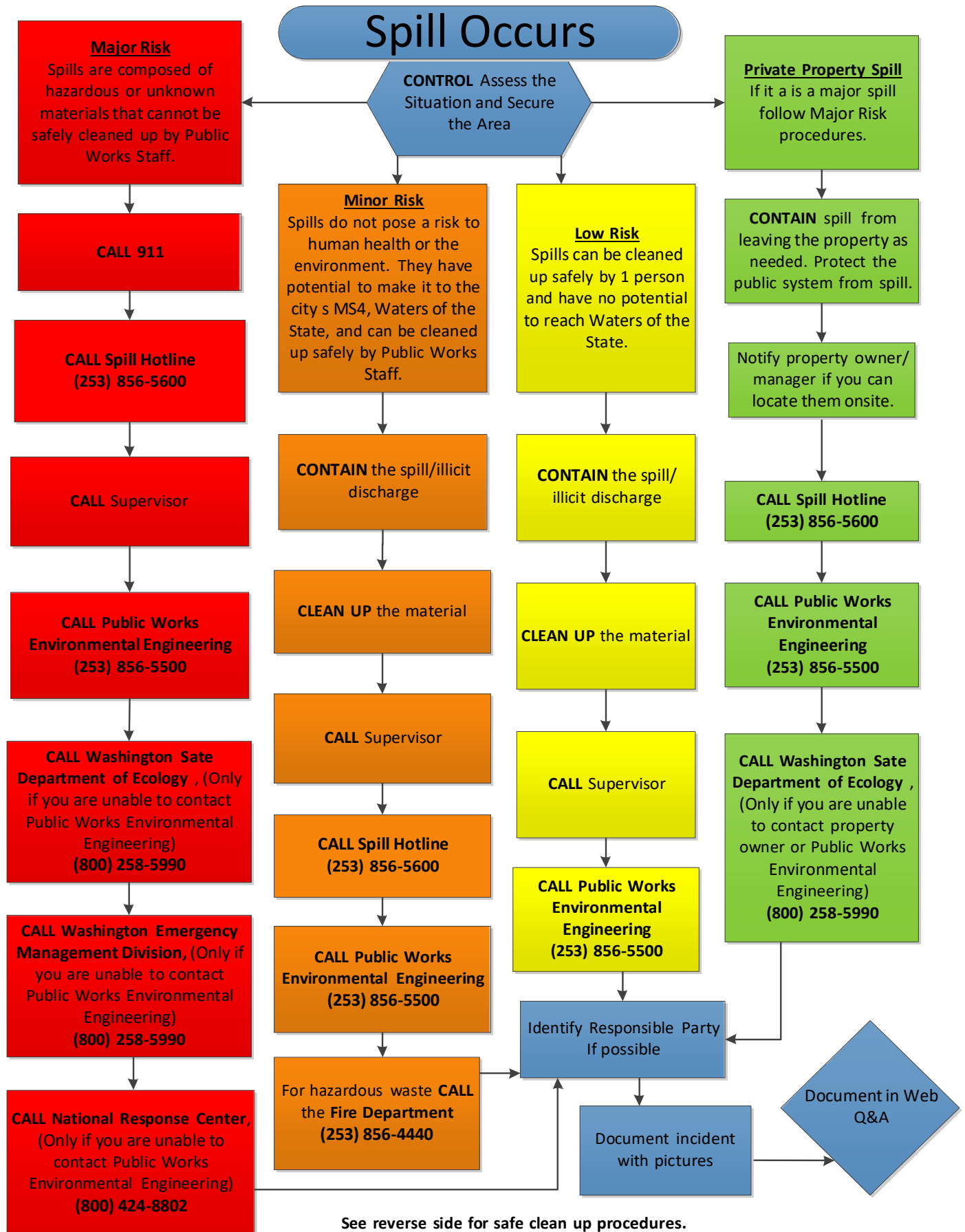
Used absorbent material should be collected, double bagged (no more than 15lbs) and labeled.

Contact Environmental Engineering for appropriate disposal method 253-856-5500.

##### CALL

Document and Report the following:

- |   |   |
|---|---|
| <input type="checkbox"/> Your Name                    | <input type="checkbox"/> Responsible Party/Property   |
| <input type="checkbox"/> Odor, Clarity & Color        | <input type="checkbox"/> Description of spill   |
| <input type="checkbox"/> Contact Information          | <input type="checkbox"/> Photos of spill ( <b>IMPORTANT</b> )   |
| <input type="checkbox"/> Date & Time                  | <input type="checkbox"/> Pollutant type/Quantity  |
| <input type="checkbox"/> Weather                      | <input type="checkbox"/> Spill destination (Asphalt, private drains, public drains, ditch, wetland, retention pond or stream) |
| <input type="checkbox"/> Address of incident Location |   |





## Appendix I (b): Risk Characterization Risk Chart

Spill Type	Report to (in this order)
<b>Low Risk</b> Spills can be cleaned up safely by 1 person and have no potential to reach Waters of the State.	Supervisor
	P.W. Environmental Engineering – (253) 856-5500
<b>Minor Risk</b> Spills do not pose a risk to human health or the environment. They have potential to make it to the city's MS4, Waters of the State, and can be cleaned up safely by Public Works Staff.	Supervisor
	Spill Hotline – (253) 856-5600
	P.W. Environmental Engineering – (253) 856-5500
	Washington State Department of Ecology - <b>only if you are unable to contact P.W. Environmental Engineering</b> - (425) 649-7000
	For hazardous waste contact the fire department – (253) 856-4440
<b>Major Risk</b> Spills are composed of hazardous or unknown materials that cannot be safely cleaned up by Public Works Staff.	911
	Spill Hotline – (253) 856-5600
	Supervisor
	P.W. Environmental Engineering – (253) 856-5500
	Washington State Department of Ecology - <b>only if you are unable to contact P.W. Environmental Engineering</b> - (425) 649-7000
	Washington Emergency Management Division - only if you are unable to contact P.W. Environmental Engineering - (800) 258-5990
	National Response Center - only if you are unable to contact P.W. Environmental Engineering- (800) 424-8802
<b>Private Property</b>	If it is a Major Risk call 911 and follow Major Risk instructions.
	Spill Hotline – (253) 856-5600
	P.W. Environmental Engineering – (253) 856-5500
	Washington Emergency Management Division - only if you are unable to contact P.W. Environmental Engineering - (800) 258-5990

## Appendix II: Inspection Checklists



STMBSI – Inspection WO#: \_\_\_\_\_

Public Works Department – Stormwater Flow Control/Treatment Facility

### Bioswale Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

*(If bioswale is associated with a pond then use the pond asset ID, but enter assessment as a bioswale inspection)*

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Site	Sign is missing, damaged, or displaying incorrect information	In good condition and info is correct		
	Existing fence is damaged and/or cannot be locked	In good repair and can be locked		
Sediment/Debris/Trash	Debris/trash accumulation	No debris or trash		
	Sediment accumulation in swale	Less than 2" deep		
Vegetation	Poor groundcover, bare or eroded patches	Less than 10% of swale bare or uncovered by veg		
	Overgrown grass/groundcover and/or noxious weeds present	Less than 10" height <i>(no grass clippings left)</i> and no noxious weeds		
	Excessive shading - veg. growth poor due to lack of sunlight	Growth not hindered by shade		
Standing Water	Standing water between storms	No standing water		
Flow Spreader	Flow spread is uneven	Flow spread is even		
Erosion	Erosion or scouring in swale bottom or slopes	No erosion or scouring		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		
IDDE Screening	Illicit discharge and/or connection evident (pollution)	No illicit discharge or connection		
Other	Other defects <i>(insert notes/comments)</i>			

*\*No indicates a corrective maintenance work order must be created and completed.*

Comments: \_\_\_\_\_

\_\_\_\_\_

*Bioswale Assessment Checklist 2015.docx*



STMMHI - Inspection WO# \_\_\_\_\_

Public Works Department – Stormwater

## Catch Basin Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Structure Type:

INLET

CBTY1

CBTY2

MH

ACCESS

~~CATCH~~ [use Control Struct. (STMXI) Checklist]

[If the structure type or location is different than what is identified on the NPDES map – submit an update request]

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Access (may be multiple)	Access and/or opening is blocked	Less than 10% blocked		
	Lid/grate/frame missing, damaged, or stuck; and/or locking mechanism missing or not working	No defects and locks properly		
	Ladder rungs missing or unsafe	Safe and sound		
Structure	Frame to top slab gap	Less than 3/4" gap		
	Cracks/holes in walls, bottom, or top slab	Cracks less than 1/4" wide/holes less than 2 sq-inches		
	Sediment accumulation in structure sump	Less than 60% of sump		
	Debris/trash (large sticks, rocks, etc...) in structure sump	Less than 33% of sump		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		
IDDE Screening	Illicit discharge and/or connection evident (pollution)	No illicit discharge or connection		
Other	Other defects (insert notes/comments)			

\*No indicates a corrective maintenance work order must be created and completed.

Comments: \_\_\_\_\_

\_\_\_\_\_

CB Assessment Checklist 2015.docx



STMXI – Inspection WO#: \_\_\_\_\_

Public Works Department – Stormwater Flow Control/Treatment Facility

## Control Structure Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Access (may be multiple)	Blocked access and/or opening	Less than 10% blocked		
	Lid/grate/frame missing, damaged, or stuck; and/or locking mechanism missing or not working	No defects and locks properly		
	Ladder rungs missing or unsafe	Safe and sound		
Structure	Frame to top slab gap	Less than 3/4" gap		
	Cracks/holes in walls, bottom, or top slab	Cracks less than 1/4" wide/holes less than 2 sq-inches		
	Sediment/debris/trash accumulation in structure sump or near bottom of FROP-T or elbow	Less than 25% of sump or more than 6" from bottom of FROP-T or elbow		
Control/Flow Restrictor (incl. elbows)	FROP-T not upright, or not secure to wall, or outlet connection not watertight	FROP-T is upright, secure, and outlet is watertight		
	Orifice plate missing, damaged, or blocked	Plate is intact and not blocked		
	Overflow pipe blocked or damaged	No blocking or damage		
	Rod/chain to cleanout gate is not attached or accessible, is damaged	Rod/chain is attached, accessible and intact		
	Cleanout gate does not open or close, is missing, damaged, blocked, or not watertight	Gate opens/closes, is intact and watertight		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		
IDDE Screening	Illicit discharge and/or connection evident (pollution)	No illicit discharge or connection		
Other	Other defects (insert notes/comments)			

\*No indicates a corrective maintenance work order must be created and completed.

Comments: \_\_\_\_\_

Control Structure Assessment Checklist 2015.docx



STMVI – Inspection WO#: \_\_\_\_\_

Public Works Department – Stormwater Flow Control/Treatment Facility

## Vault/Detention Tank Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Site	Overgrown grass/groundcover and/or noxious weeds present	Less than 18" height and no noxious weeds		
	Debris/trash accumulation	No debris or trash		
Access (may be multiple)	Access or opening is blocked	Less than 10% blocked		
	Lid/grate/frame missing, damaged, or stuck; and/or locking mechanism missing or not working	No defects and locks properly		
	Ladder rungs missing or unsafe	Safe and sound		
Structure	Frame to top slab gap	Less than 3/4" gap		
	Cracks/holes in walls, bottom, or top slab	Cracks less than 1/2" wide/holes less than 2 sq-inches		
	Sediment/debris/trash accumulation in any area of vault sump	Less than 10% of sump OR more than 6" from bottom of FROP-T or elbow		
	Air vents plugged/blocked	Less than 50% blocked		
Control/ Flow Restrictor (incl. elbows)	FROP-T not upright, or not secure to wall, or outlet connection not watertight	FROP-T is upright, secure, and outlet is watertight		
	Orifice plate missing, damaged, or blocked	Plate is intact and not blocked		
	Overflow pipe blocked or damaged	No blocking or damage		
	Rod/chain to cleanout gate is not attached or accessible, is damaged	Rod/chain is attached, accessible and intact		
	Cleanout gate does not open or close, is missing, damaged, blocked, or not watertight	Gate opens/closes, is intact and watertight		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		

\*No indicates a corrective maintenance work order must be created and completed.

Checklist continued on page 2

Page 1 of 2

Vault Assessment Checklist 2015.docx





STMVI – Inspection WO#: \_\_\_\_\_

Public Works Department – Stormwater Flow Control/Treatment Facility

## Baffle or Coalescing Plate Oil/Water Separator Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Access (may be multiple)	Blocked access and/or opening	Less than 10% blocked		
	Lid/grate/frame missing, damaged, or stuck; and/or locking mechanism missing or not working	No defects and locks properly		
	Ladder rungs missing or unsafe	Safe and sound		
Structure	Frame to top slab gap	Less than 3/4" gap		
	Cracks/holes in walls, bottom, or top slab	Cracks less than 1/2" wide/holes less than 2 sq-inches		
	Sediment/debris/trash accumulation in sump or on coalescing plates	Less than 6" in sump and none on plates		
	Oil accumulation at water surface	Less than 1"		
	Ventilation pipes plugged/blocked	Less than 50%		
	Baffles corroded, cracking, warping, and/or signs of failure	Baffles are up to specifications		
	Coalescing plates broken, deformed, cracked and/or signs of failure	Plates are up to specifications		
	Shutoff valve damaged or inoperable	No defects		
	Gravity drain valve, damaged, not sealed, or inoperable	No defects		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		
Discharge Water	Evidence of poor water quality in effluent discharge	Water is clear with no visible sheen		
IDDE Screening	Illicit discharge and/or connection evident (pollution)	No illicit discharge or connection		
Other	Other defects (insert notes/comments)			

\*No indicates a corrective maintenance work order must be created and completed.

Comments: \_\_\_\_\_

Oil Water Separator Assessment Checklist 2015.docx



STMMVI – Inspection WO#: \_\_\_\_\_

Public Works Department – Stormwater Flow Control/Treatment Facility

## Media Filter Vault Assessment Checklist

Date: \_\_\_\_\_

Asset ID: \_\_\_\_\_

Assessor(s): \_\_\_\_\_

Location: \_\_\_\_\_

Maintenance Component	Condition When Maintenance Is Needed	Maintenance Standard	Meets Standard? No* or Yes or N/A	Notes and/or Corrective Maintenance WO#
Site	Overgrown grass/groundcover and/or noxious weeds present	Less than 18" height and no noxious weeds		
	Debris/trash accumulation	No debris or trash		
Access (may be multiple)	Blocked access and/or opening	Less than 10% blocked		
	Lid/grate/frame missing, damaged, or stuck; and/or locking mechanism missing or not working	No defects and locks properly		
	Ladder rungs missing or unsafe	Safe and sound		
Structure	Frame to top slab gap	Less than 3/4" gap		
	Cracks/holes in walls, bottom, or top slab	Cracks less than 1/2" wide/holes less than 2 sq-inches		
	Baffles damaged (corroded, cracked, warped) or other signs of failure	No damage or failure		
	Sediment/debris/trash accumulation in vault sump	Less than 2" average in sump		
Filter Media Cartridges (indicators of defective cartridges or pipes)	Sediment on top of cartridges	Less than 1/2"		
	Thick or multiple scum-lines on top of cartridges	No thick scum-lines		
	Submerged cartridges and/or static water in vault for more than 24 hrs after rain event	Less than 9" static water		
	Bypass condition present after avg. rainfall event	No bypass condition present		
Inlet/Outlet Pipes	Blocked or damaged	No blocking or damage		
	Sediment/debris/trash accumulation in pipe	Less than 20%		
IDDE Screening	Illicit discharge and/or connection evident (pollution)	No illicit discharge or connection		
Other	Other defects (insert notes/comments)			

\*No indicates a corrective maintenance work order must be created and completed.

Comments: \_\_\_\_\_

Media Filter Vault Assessment Checklist 2015.docx

## Appendix III: Stormwater Hotspots

### Storm Hot Spots

1. Lake Fenwick Rd & S 251<sup>st</sup> Ct: Bird cage on the West side of Lake Fenwick Rd across from S 251<sup>st</sup> Ct
2. 25803 Lake Fenwick Rd: Culvert end on West side of Lake Fenwick Rd across from Lake Fenwick Trailhead parking lot
3. 3808 Reith Rd: Through curb CB on Northwest corner of parking lot entrance of West Fenwick Park
4. 38<sup>th</sup> Ave S. & Reith Rd: Culvert that sits on the North side of Reith Rd. right on the corner of 38<sup>th</sup> Ave S.
5. 3903 S. 248<sup>th</sup> St.: CB's on bottom of hill across from the house and Armory
6. Military Rd. S & Kent Des Moines Rd: Two CB's on the West side of Military just before heading south across Kent Des Moines road.
7. Military Rd. S & S 239<sup>th</sup> St.: The CB on the west side of Military & 239<sup>th</sup> St.
8. S 244<sup>th</sup> St. & 35<sup>th</sup> Ave S.: The two CB's on 244<sup>th</sup> St. Just before 35<sup>th</sup> Ave
9. S 248<sup>th</sup> St. & Hwy 99: CB at bottom of cul de sac.
10. S. 260<sup>th</sup> St. just east of 25<sup>th</sup> Ave S: CB on North side of S. 260<sup>th</sup> across from West Hill Mobile Manor.
11. S. 259<sup>th</sup> Pl. & I-5 overpass: Two CB's on S. 259<sup>th</sup> Pl. just under Overpass
12. 7235 S. 227<sup>th</sup> Pl.: Two CB's that sit on the East side of 72<sup>nd</sup> Ave on S. 227<sup>th</sup> Pl
13. 21661 76<sup>th</sup> Ave S.: Mill Creek Crossing that runs on the West side of 76<sup>th</sup> Ave
14. 21550 72<sup>nd</sup> Ave S.: Mill Creek Crossing that runs on the East side of 72<sup>nd</sup> Ave S. across from S. 216<sup>th</sup> St.
15. 19600 81<sup>st</sup> Ave S.: The bar screen and bee hive that is just west of the 81<sup>st</sup> pump station on 81<sup>st</sup> Ave
16. 21725 102<sup>nd</sup> Pl. SE.: Garrison Creek Dam off SE 216<sup>th</sup> St. & 102<sup>nd</sup> Pl SE
17. 88<sup>th</sup> Ave S & S 235<sup>th</sup> Pl: Culvert on the East side of 88<sup>th</sup> Ave S @ South entrance of apartment complex towards far South end of 88<sup>th</sup> Ave S
18. 88<sup>th</sup> Ave S 450ft South of S 235<sup>th</sup> Pl: Bar screen in ditch line on East side of S 235<sup>th</sup> Pl
19. 88<sup>th</sup> Ave S 340ft South of S 235<sup>th</sup> Pl: Culvert end and bar screen on West side of S 88<sup>th</sup> Ave S
20. 88<sup>th</sup> Ave S & S 235<sup>th</sup> Pl: Culvert crossing that goes under S 235<sup>th</sup> Pl in apartment complex 250ft West of 88<sup>th</sup> Ave S
21. S 218<sup>th</sup> St & 94<sup>th</sup> Pl S: CBs on North side of S 218<sup>th</sup> St between 94<sup>th</sup> Pl S & 98<sup>th</sup> Ave S.
22. 22704 100<sup>th</sup> Ave SE: Twin culverts and the 3 chain link screens upstream of it on the East side of 100<sup>th</sup> at bottom of ravine just south of SE 227<sup>th</sup> St.
23. 116<sup>th</sup> Ave SE & SE 210<sup>th</sup> Pl: Culvert Ends in wetland on either side of the street
24. 22916 101<sup>st</sup> Pl. SE: Brier Lane bar screen and the 4 chain link screens upstream from it at the end of 101<sup>st</sup> Pl. SE roundabout
25. 10005 SE 235<sup>th</sup> St.: Bar screen at Apartment complex on Se 235<sup>th</sup> St.
26. 10500 SE 236<sup>th</sup> St.: Bar screen on the North side of SE 236<sup>th</sup> St. just off of 104<sup>th</sup> Ave SE
27. 24152 108<sup>th</sup> Ave SE: Bar screen on the East end of 108<sup>th</sup> Ave SE
28. 13101 SE 236<sup>th</sup> Pl: Bar screen on the North side of SE 236<sup>th</sup> Pl. just before 131<sup>st</sup> Ave SE
29. 13500 SE 240<sup>th</sup> St: Bar screen on the North side of 240<sup>th</sup> St. just East of 135<sup>th</sup> Pl. SE
30. SE 240<sup>th</sup> St. & 146<sup>th</sup> Pl. SE: CB & Bee hive on the East side of SE 240<sup>th</sup> St. at start of guard rail.
31. 24001 148<sup>th</sup> Ave SE.: Culvert at bottom of 240<sup>th</sup> hill where 148<sup>th</sup> Ave meet on the West side of SE 240<sup>th</sup>
32. 24499 148<sup>th</sup> Ave SE: Culvert going under 148<sup>th</sup> Ave SE right across the street from horse pasture about 100ft North of 148<sup>th</sup> Ln.
33. 24418 147<sup>th</sup> Ave SE: Bar screen in wet land at the end of 148<sup>th</sup> Ln. SE off of 148<sup>th</sup> Ave Se.
34. 14201 SE 256<sup>th</sup> St.: Culvert with concrete ditch on South side of SE 256<sup>th</sup> St. just off 144<sup>th</sup> Ave SE
35. 26431 148<sup>th</sup> Ave SE: Small round CB on the west side of 148<sup>th</sup> Ave SE in driveway and the outfall on the East side of the street directly across from the CB
36. 14826 SE 270<sup>th</sup> St.: Lake Meridian bar screen at boat launch
37. Lake Meridian fish screen: Directly across from boat launch entrance on the NE side of 152<sup>nd</sup> Way SE Remove Ballers to drive back in dog park
38. 27166 152<sup>nd</sup> Way SE: Bar screen on East side of 152<sup>nd</sup> Way, inside Cascade Mobile Villa park homes



39. 25877 124<sup>th</sup> Ave SE: Bee Hive in wet land on the East side of 124<sup>th</sup> Ave SE just before SE 259<sup>th</sup> St.
40. 27046 114<sup>th</sup> Ave SE: Bar screen in wetland on the East side of 114<sup>th</sup> Ave SE just south of SE 270<sup>th</sup> St.
41. 11115 SE 269<sup>th</sup> St. : Tudor Square culvert that runs directly under SE 269<sup>th</sup> St. Just West of 112<sup>th</sup> Ave SE.
42. 26410 108<sup>th</sup> Ave SE: Culvert that runs East & West under 108<sup>th</sup> Ave SE just South of SE 264<sup>th</sup> St.
43. 26016 107<sup>th</sup> Pl. SE: Bar screen inside fence at the end of 107<sup>th</sup> Ave SE alongside of apartment complex ( Little Russia)
44. 10518 SE 266<sup>th</sup> Pl. : Big bar screen on the dirt road just off the West side of 106<sup>th</sup> Ave SE alongside a house South of SE 266<sup>th</sup> Pl.
45. 104<sup>th</sup> Ave SE & Se 267<sup>th</sup> St.: The intersection along the West side of 104<sup>th</sup> shoulders need attention. Water puddles and cant exit road.
46. 10020 SE 256th St (KM High School): Birdcage behind French Field. Access from top parking lot in back of school.
47. 25636 97<sup>th</sup> Pl. S: American Legion bar screen & CB. Drive down driveway all the way around building to road that leads you to Canyon Drive. About 80ft on the right.
48. 9526 Canyon Drive: Bar screen that sits North East side of Canyon Dr. inside Triangle Park.
49. 9404 S. 248<sup>th</sup> St.: Culvert that runs along the East side of 94<sup>th</sup> Ave S. on the corner of S 248<sup>th</sup> St.
50. Alvord Ave N. & E. Smith St.: Bar screen on the North East corner of E Smith St.
51. 600 E. Smith St.: Senior Center bar screen around back of building
52. 101 Reiten Rd.: Bee hive across from Earthworks park entrance
53. 100 Reiten Rd.: Inside Earthworks Park Bee hive & pipe outfall.
54. 100 Reiten Rd.: Inside Earthworks Park trash rack alongside Canyon Dr.
55. 100 Reiten Rd.: Inside Earthworks Park lower trash rack alongside Canyon DR.
56. 120 Kensington Ave S.: Bar screen on the South East side of Kensington next to house.
57. 301 Scenic Way: CB & Bar screen on E Titus St. on the south west corner E Titus & E Scenic way.
58. 810 Van de Vanter Ave: Bar screen on the East side of Van de Vanter just south of Marion St.
59. 704 Central Ave S.: Large bee hive on hill side above Fox Electric located on Burke Ave.
60. 8043 S. 266<sup>th</sup> St.: Two CB's on 266<sup>th</sup> St that run parallel under train tracks.
61. 850 Central Ave. N. - Kent Memorial Park
62. 24400 Russell Rd. - Russell Road Park
63. 14800 SE 272<sup>nd</sup> St. - Lake Meridian Park
64. 14608 SE 288th St. - Service Club Park

## Appendix IV: Definitions and Acronyms

The following words, terms, and phrases will have the meanings ascribed to them in this section, unless a different meaning is plainly required.

**303 (d) waterbody** means any body of water that does not meet water quality standards as defined by section 303 (d) of the Clean Water Act.

**AKART** is an acronym meaning all known, available and reasonable methods of prevention, control and treatment. AKART shall represent the most current methodology that can be reasonably required for preventing, controlling, or abating the pollutants associated with a discharge. The concept of AKART applies to both point and nonpoint sources of pollution.

**BMPs or Best management practices** means schedules of activities, prohibitions of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or the MS4. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

**Clean Water Act (CWA)** means the federal Water Pollution Control Act ([33 U.S.C. 1251](#), et seq.), and any subsequent amendments thereto.

**Construction activity** means land-disturbing operations including clearing, grading or excavation which disturbs the surface of the land. Such activities may include road construction, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

**Director** means the city of Kent public works department director.

**Groundwater** means water in a saturated zone or stratum beneath the surface of the land or below a surface water body.

**Hazardous material** means any material; including any substance, waste, or combination thereof; which because of its quantity, concentration, or physical, chemical, or infectious characteristics; may cause or significantly contribute to a substantial present or potential hazard to human, health, safety, property, or the environment; when improperly treated, stored, transported, disposed of, or otherwise managed.

**Hyperchlorinated** means water that contains more than ten (10) mg/liter chlorine. Disinfection of water mains and appurtenances requires a chlorine residual of ten (10) mg/liter at the end of the disinfection period.

**Illicit connection** means any conveyance that is connected to the MS4 without a permit, excluding roof drains and foundation drains. Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4. Illicit connections allow an illicit discharge to enter the MS4 and include, but are not limited to, any conveyances which allow any non-stormwater discharge including sewage, process wastewater, and wash water to enter the MS4; any connections to the MS4 from indoor drains and sinks, regardless of whether such drain or connection was previously allowed, permitted, or approved by an authorized enforcement agency; or any drain or conveyance connected from a commercial or industrial land use to the storm drain system which has not been documented in plans, maps, or equivalent records and approved by the city or another agency of government duly authorized to give such approvals.

**Illicit discharge** means any discharge to a MS4 that is not composed entirely of stormwater or of allowed non-stormwater discharges as specified in the permit.

Incidental spills and illicit discharges meet all of the following conditions:

1. The spilled material is known.
2. The material spilled is not highly toxic.
3. The quantity spilled is small enough that it can be safely cleaned up using public works spill kits.
4. There is no fire hazard present.
5. The spill can be completely contained and the material has little or no potential to reach the stormwater system or surface Waters of the State.

6. If material enters Waters of the State, it is **NOT** an incidental release.

**Industrial activity** means activities subject to NPDES industrial permits as defined in [40 CFR 122.26\(b\)\(14\)](#).

**Major spills and illicit discharges** mean any hazardous or unknown materials, or spills of a known non-hazardous material larger than can be safely contained and cleaned up by the public Works staff. These pose a risk to the responder, the public, or the environment.

**Minor spills and illicit discharges** do not pose a risk to human health or the environment **and** have not entered Waters of the State.

**MS4 or Municipal separate storm sewer system** means a conveyance, or system of conveyances; including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains:

1. Owned or operated by a state, city, town, county, district, port, or other public body created by or pursuant to state law having jurisdiction over disposal of wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the CWA that discharges to Waters of the State;
2. Designed or used for collecting or conveying stormwater;
3. Which is not a combined sewer; and
4. Which is not part of a publicly owned treatment works ("POTW") as defined at [40 CFR 122.2](#).

**National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit** means a permit issued by the U.S. Environmental Protection Agency, or by the Washington Department of Ecology under authority delegated pursuant to [33 U.S.C. 1342\(b\)](#), that authorizes the discharge of pollutants to Waters of the State, whether the permit is applicable to an individual, group, or general area-wide basis.

**Non-stormwater discharge** means any discharge to the MS4 that is not composed entirely of stormwater.

**Outfall** means point source as defined by [40 CFR 122.2](#) at the point where a municipal separate storm sewer discharges to Waters of the State and does not include open conveyances connecting two municipal separate storm sewer systems, or pipes, tunnels, or other conveyances which connect segments of the same stream or other Waters of the State and are used to convey Waters of the State.

**Owner/operator** means any person or entity with an ownership interest or control over real property on which a violation of this chapter occurs, any person or entity participating in any activity regulated by this chapter, and any person or entity participating in any violation of this chapter.

**Pollutant** means anything which causes or contributes to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; nonhazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, and accumulations, so that the same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous materials and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.

**Premise** means any real property or interest in real property and any improvement upon real property.

**RCW** means the state Revised Code of Washington. It is the compilation of all permanent state laws now in force.

**Sanitary sewage** means domestic wastewater including flushed toilet water, water from dishwashers, clothes washing machines, and any other used water that generally is disposed of down interior household drains.

**Sanitary sewer system** means a conveyance, or system of conveyances, which is designed to convey domestic wastewater.

**Stormwater** means any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

**Stormwater Management Program (SWMP)** means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 or S6 of the Western Washington Phase II Municipal Permit and any additional actions necessary to meet the requirements of applicable.

**Stormwater Pollution Prevention Plan (SWPPP)** means a document which describes the BMPs and activities to be implemented by an owner/operator or business to identify sources of pollution or contamination at a site, and the actions to eliminate or reduce pollutant discharges to stormwater, the MS4, and/or receiving waters.

**Wastewater** means any water or other liquid, other than uncontaminated stormwater, discharged from any premises.

**Water quality standards** means the Water Pollution Control Act, as defined herein; Surface Water Quality Standards – Chapter [173-201A WAC](#); Ground Water Quality Standards – Chapter [173-200 WAC](#); and Sediment Management Standards – Chapter [173-204 WAC](#). The water quality standards are established to sustain public health and public enjoyment of the waters and the propagation and protection of fish, shellfish, and wildlife.

**Waters of the State** means those waters as defined as “waters of the United States” in [40 CFR 122.2](#) within the geographic boundaries of the state of Washington and “Waters of the State” as defined in Chapter [90.48 RCW](#), which includes lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and water courses within the jurisdiction of the state of Washington.

**Western Washington Phase II Municipal Stormwater Permit** means a program that applies to all regulated small municipal separate storm sewer systems located west of the eastern boundaries of the following counties: Whatcom, Skagit, King, Pierce, Lewis, and Skamania.



## City of Kent 2020 Annual Report Question #4a

The City of Kent's 2021 Stormwater Management Program Plan includes coordination mechanisms among departments to eliminate barriers to compliance with the terms of the Permit. Described below are these coordination mechanisms organized by the associated permit program sections.

### **S5.C.1 Stormwater Planning**

The City of Kent has convened an inter-disciplinary team to inform and assist in the development, progress, and influence of this program. These team members include staff who can use their expertise to advise in the planning of stormwater investments and actions to accommodate future growth in a way that emphasizes protection of designated uses and improves receiving water quality and habitat under both existing and anticipated future development condition.

### **S5.C.4 MS4 Mapping and Documentation**

Maps of the city's municipal separate storm sewer system (MS4) assure that illicit discharges and spills can be traced upstream for source detection. Maps also aid in identifying downstream fate of non-stormwater discharges. This information can aid in isolating, diverting, and remediating non-stormwater discharges.

The city's Geographic Information System (GIS) Division maintains an electronic stormwater system database as a visible map layer that depicts all city-owned stormwater system conveyance, stormwater facilities, outfalls, treatment and flow control best management practices (BMPs), and non-groundwater receiving waters. This database is updated regularly to reflect new and altered stormwater infrastructure based upon as-built plans received from completed construction projects. GIS staff also rely on submittals of map update requests by field staff. In addition, the city's GIS department is in the process of mapping low impact development (LID) facilities and all privately-owned stormwater systems in the city. GIS staff rely on Environmental Compliance Inspectors to submit map update requests as needed to ensure that the mapping of private systems and LID facilities are accurate.

### **S5.C.5 Illicit Discharge Detection and Elimination**

The city's detection program for non-stormwater discharges and illicit connections relies heavily on city staff to recognize and report suspected illicit discharges, connections, and spills. The city provides ongoing training for all field staff for identification, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections. Follow-up training is provided as needed to address changes in procedures, techniques, requirements, or staffing. Raining is documented.

### **S5.C.6 Controlling Runoff from New Development, Redevelopment, and Construction Sites**

Kent has an ongoing development review and inspection program to reduce pollutants and stormwater flow rates from new development, redevelopment, and construction site activities. The program applies to all private and public development, including roads.

City NPDES program staff inform city engineers, building inspectors and city planners on Permit requirements and the responsibilities of these staff members to meet Permit requirements. These staff members work together through pre and post-construction meetings and a shared review process that includes site plan review, inspection, and enforcement-capability provisions to ensure that projects meet all the minimum and local requirements outlined in S5.C.6.b.

When a permit application is filed with the Permit Center, there is a notification that is sent to NPDES program staff to alert them of a possible change of use for a facility. NPDES staff can then research the facility to ensure that it has the proper BMPs in place to protect against illicit discharges and connections to the drainage system or waters of the state. This system requires that NPDES staff sign off on the permit after they ensure that the facility has the necessary BMPs in place to be in compliance with city standards and Permit requirements.

The following documents are used as coordination mechanisms by all city staff members to ensure compliance with the terms of the Permit:

City of Kent Stormwater Management Program Plan

City of Kent Drainage Master Plan

City of Kent Surface Water Design Manual

City of Kent Design and Construction Standards

#### **S5.C.7 Operations and Maintenance**

The City of Kent implements and documents a program to regulate maintenance activities and to conduct maintenance activities to prevent or reduce stormwater impacts. Public Works Operations (PWO) staff perform the inspections and maintenance of the city's MS4 to meet the requirements of S5.C.7 of the Permit. NPDES programs staff coordinate with PWO staff to ensure that the implementation and documentation of the inspection and maintenance program is conducted to meet Permit requirements. This coordination is achieved through:

regularly scheduled program update meetings,

automated weekly inspection and maintenance progress reports,

on-going training of PWO staff performed by NPDES staff on general pollution prevention and permit requirements, including maintenance BMPs, IDDE procedures, and

collaborative development of the Stormwater Pollution Prevention Plan.

## **City of Kent 2020 Annual Report Question #6**

### **S5.C.1.b.i(a)**

The City of Kent Transportation Master Plan

The City of Kent Drainage Master Plan

The City of Kent Midway Subarea Plan

The City of Kent Comprehensive Plan

The City of Kent Shoreline Master Program

## **City of Kent 2020 Annual Report Question #16a**

### **S5.C.1.c**

Kent continues to improve the implementation of LID BMPs. Kent has observed that the most pronounced barrier appears to be the lack of experience in design, design review, installation, and maintenance of LID BMPs. Lack of formal training opportunities on the new King Co Manual and LID BMP implementation in general have contributed to the challenge, but the city and its partners are continually working to improve LID implementation policies and practices.

Through our evaluation process we have determined that the city may benefit from more focus on big-picture and perhaps regional opportunities for stormwater flow control and water quality LID facilities when planning for future growth. The current city drainage master plan focuses more on storm system improvement related to capacity and reducing flood risk. Through this interdisciplinary planning process and in our forthcoming update of the city's drainage master plan, the city will continue to evaluate opportunities to integrate LID facilities into long range planning efforts, including as retrofits and in underserved areas.



# City of Kent Public Education and Outreach Program

## S5.C.2: PUBLIC EDUCATION AND OUTREACH

The city's stormwater public education and outreach program strives to build awareness and affect change that will ultimately reduce pollutants in stormwater and improve water quality in waters of the state. To accomplish this, the program focuses on providing accessible resources for information, services, and activities that may help people in Kent better understand and cooperate in stormwater best management practices. By promoting understanding and cooperation through this program, the city hopes that a more knowledgeable and engaged community will adopt attitudes and behaviors that decrease detrimental influences on stormwater.

This program is generally organized to follow and address the minimum performance measures outlined in permit subsection S5.C.2, with subparts denoted when appropriate:

- Build general awareness about methods to address and reduce impacts from stormwater runoff.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.



### S5.C.2.a.i – BUILD GENERAL AWARENESS

It is Kent's goal to continue improving awareness and involvement in stormwater management with the general public, businesses, engineers, contractors, developers, land use planners, residents, landscapers, and property managers and owners. The city utilizes local and regional resources, campaigns and programs to provide opportunities for education and stewardship for these target audiences in Kent. The following measures are intended to support information sharing and compel desired action from each audience in the various subject areas surrounding stormwater.

#### S5.C.2.a.i.a – BUILD GENERAL AWARENESS WITH THE GENERAL PUBLIC AND BUSINESSES

The city supports building general awareness with the general public and businesses in the following subject areas outlined in the permit:

- General impacts of stormwater on surface waters.
- Impacts from impervious surfaces.
- Low impact development (LID) principles and LID best management practices (BMPs).

The city achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below:

- City of Kent 2020 Stormwater Management Program Plan
- City of Kent Drainage Master Plan
- City of Kent Surface Water Design Manual
- Personal interactions (via phone, email, and face-to-face)
- Kent's city website: [www.kentwa.gov](http://www.kentwa.gov)
- Environmental compliance inspections
- Source control inspections
- Fats, oil, and grease (FOG) inspections
- Hazardous Waste Facility Inspections
- Response to private drainage concerns
- Operations and Maintenance activities
- Kent TV21 – Public Works Committee Meetings
- Kent Reporter
- Direct mailings
- Puget Sound Starts Here campaigns
- Social media through Kent's Facebook YouTube and Twitter accounts
- Planet Protectors Summit event for school-aged children
- Puget Sound Spill Kit Program
- City Council and Committee Meetings
- Public Land Use Notices
- Neighborhood meetings
- Educational brochures
- Posters and stickers
- Signs posted at ponds and wetlands, and for "No Dumping"
- Storm drain markers

Due to Covid-19 restrictions, public events such as the Planet Protectors Summit, Public Works Appreciation Week Event, You, Me We, Summer's Almost Over and the Kent Farmers Market had to be cancelled until restrictions are lifted. We did switch to virtual events when possible to accommodate event attendance. In 2021 we will be hosting a virtual Planet Protectors Summit for students residing in Kent.

### **S5.C.2.a.i.b – BUILD GENERAL AWARENESS WITH ENGINEERS, CONTRACTORS, DEVELOPERS AND LAND USE PLANNERS**

The city fosters building general awareness with engineers, contractors, developers and land use planners in the three following subject areas in the permit:

- Technical standards for stormwater site and erosion control plans
- LID principles and LID BMPs
- Stormwater treatment and flow control BMPs/facilities

The city achieves compliance with these three subject areas, through the services, activities, and publications listed below.

- City of Kent Stormwater Management Program Plan
- City of Kent Drainage Master Plan
- City of Kent Surface Water Design Manual
- City of Kent Design and Construction Standards



- Personal interactions (via phone, email, and face-to-face)
- Kent's city website: [www.kentwa.gov](http://www.kentwa.gov)
- Direct mailings
- Environmental compliance inspections
- Source control inspections
- Kent Permit Center
- Project plan development and review
- Pre and post-construction meetings
- Construction inspections
- Building inspections
- Erosion and sediment control inspections
- Certified Erosion and Sediment Control Lead (CESCL) training
- WA Department of Ecology LID training courses
- Professional Conferences

## City of Kent 2020 Annual Report Question #26a

### S5.C.2.a.iii – CREATE STEWARDSHIP OPPORTUNITIES

The city encourages stormwater stewardship and works to promote stewardship opportunities through local and regional initiatives. Below is a list of ongoing opportunities and special events that the city supports and invites the public to take part in.

- Puget Sound Starts Here campaign
  - Drain Ranger Program
  - Don't Drip and Drive
  - Scoop Every Poop
  - Natural Yard Care
- Community volunteer groups
- Green Kent Partnership
- Kent Adopt-A-Street Program
- Neighborhood Grant Program
- King County Wastemobile program
- Recycling and hazardous waste collection events
- Public Works Week Open House Day
- Kent Green Apartment/Condominium Program
- Storm Drain Markers

Some of these events such as some of the community volunteer groups had to be put on hold or reorganized to meet Covid 19 restrictions.



## City of Kent 2020 Annual Report Question #30a

### S5.C.4.b.i – Outfall Data Collection

*S5.C.4.b.i - No later than January 1, 2020, begin to collect size and material for all known MS4\* outfalls during normal course of business (e.g. during field screening, inspection, or maintenance) and update records.*

The City of Kent has already begun to document this data. At this point 40% of all outfalls already have pipe size and type documented, 36% have pipe size documented, and 2 outfalls have pipe type only documented. City staff have mapped out the outfalls that still need data collected and they will use this map to collect the data during their normal course of business.

The full outfall data spreadsheet is available upon request.



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- \* MS4 means Municipal Separate Storm Sewer System, which is the city owned and operated storm drainage system.

## City of Kent 2020 Annual Report Question #42

### S5.C.5 – ILLICIT DISCHARGE DETECTION AND ELIMINATION REPORT

Date incident discovered or reported to you	Date of end of your response	How was the incident discovered or reported to you?	Discharge to MS4?	Incident Location	Pollutants Identified	Source or Cause	Correction/elimination methods used	Field notes, explanations, and/or other comments
1/13/2020	1/14/2020	ERTS referral	No - none found	Davis Wire Corp. 19411 80th Avenue South, Kent, Wa	Other - Waste water that contains hydrochloric acid	Other commercial/industrial activity	Clean-up	500 gals of produced waste water containing hydrochloric acid with pH3. Davis Wire hired Sterecycle to respond to the spill for cleanup. Staff, Ecology, and NRC on site. CLINE confirmed that company has a General WQ permit. Nothing entered MS4.
1/23/2020	1/23/2020	ERTS referral	No - none found	1166 6th Avenue North, Kent, Wa	Fuel and/or other vehicle related fluids	Other commercial/industrial activity	Clean-up Education/technical assistance	WebQA #WO 45229 DOE was called for a oil/coolant spill coming from the SE corner of the Valley Machine Shop. Matt M. found out they had an equipment leak that they cleaned up. Did not reach the outside of building. Possible report by employee let go.
1/23/2020	1/28/2020	Staff referral	No - cleaned up before reached MS4	19115 West Valley Highway, Kent, Wa	Fuel and/or other vehicle related fluids	Unconfirmed, unspecified, or not identified	Clean-up Education/technical assistance	WebQA #WO45230 10gal gas spill reported in the parking lot of the business park. Staff found out that it was a private issue, so they contained the spill. Spill was cleaned up by NRC, staff confirmed. Staff also educated the site manager.
1/25/2020	1/27/2020	ERTS referral	No - none found	Just North of the intersection at South 228th Street & Russell Road, Kent, Wa	Sediment/soil	Construction activity	Clean-up Add or modify treatment BMP	ERTS #695985 Turbid runoff excess of 250 NTU leaving construction site (Russell Levy Project). Staff inspected and met w/ contractor last week and was informed a fix is in progress (additional BMPs). Discharge is to City property with no impact to MS4.

1/28/2020	1/30/2020	ERTS referral	No - none found	Russell Levy Project At the intersection of South 228th Street & Russell Road, Kent, Wa	Sediment/soil	Construction activity	Clean-up Add or modify structural source control BMP	ERTS #696084 Turbidity reading taken from runoff was measured at greater than 250NTU. Runoff is captured in gravel roadside, ponding is also high. Our TESC Inspector is working with this property to ensure proper BMPs are in place.
1/29/2020	1/29/2020	Staff referral - Kent PD	Yes - notified Ecology	9045 Canyon Drive, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle collision	Clean-up	WebQA #W045304 Kent PD reported a collision on the 9000 block of Canyon Dr. with fuel/oil running down the road/hill.  Staff on-site used absorbent material to clean up the spill and the downstream CB. Very little amount spilled, could be coolant.
1/30/2020	1/30/2020	Staff referral	Yes - notified Ecology	At the intersection of South 212th Street & 77th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle collision	Clean-up	PD called staff about a spill due to a vehicle accident. Oil and Coolant was on the northeast corner of the intersection. Staff used 5 bags of Grease Sweep. They put booms in 2 CBs on the eastside of 77th. Grease Sweep was swept up and disposed of.
1/30/2020	2/3/2020	Staff referral	No - cleaned up before reached MS4	At the intersection of South 212th Street & 64th Avenue South, Kent, Wa	Sediment/soil	Unconfirmed, unspecified, or not identified	Clean-up	WebQA #W045315 Heading E/B on S 212th St near 64th Ave S there is a huge pile of mud/dirt in the road. Street Section is already handling this, James Olive is taking a truck to scoop up the dirt/mud and a street sweeper was called out as well.
2/6/2020	2/6/2020	ERTS referral	No - none found	WA-167 Northbound	Fuel and/or vehicle related fluids	Other accident/spill	Other - Not in the City right of way. DOT responded.	ERTS #696335 Not in the City right of way. DOT responded.  Longitude and Latitude may or may not be correct. Unclear on exact location from ERTS and IDDE report.

2/7/2020	2/7/2020	ERTS referral	No - none found	20202 84th Avenue South, Kent, WA 98032	Fuel and/or vehicle related fluids	Other - vehicle leak	Clean-up	ERTS 696385 Amazon staff reported a vehicle leaked 2 quarts of motor oil. Some went into two CBs. Clean up is ongoing. Incident occurred at 1038. (CB's 1 & 2). A crew has been hired to clean out the impacted CBs and the pavement.
2/11/2020	2/11/2020	ERTS referral	No - none found	19918 68th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up	ERTS #696459 EOC notified of report from caller on behalf of FedEx: A FedEx truck lost an oil pan at a Chevron station leaking 2-gal. motor oil to asphalt. They hired CleanHarbors. No drains involved and clean up completed. No further action necessary.
2/19/2020	2/25/2020	Pollution hotline (phone, web, app)	Unknown	13731 Southeast 257th Court, Kent, Wa	Other - Round Up herbicide	Landscape-related business	Education/technical assistance Add or modify operational source control BMP	WebQA #W045557 Lake meridian village town homes HOA has sprayed/applied round up lake front and also by natural flowing creek into lake meridian.  This was assigned to our Critical Areas Staff. They provided education to property owner/manager.
2/19/2020	2/19/2020	ERTS referral	No - none found	8800 South 190th Street, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up Add or modify operational source control BMP	ERTS #696638Verisk #3E reporting for Home Depot. Estimated 1 gal. of anti-freeze was released to a parking lot while an employee was refilling radiator tanks on a truck. The overflow did not impact drains, soil or water. Cleanup has been conducted.
2/20/2020	2/27/2020	Pollution hotline (phone, web, app)	No - none found	8127 South 216th Street, Kent, Wa	other	Other - No illicit discharge	Other - No correction needed	WebQA #W045565 Resident jogs by the drainage ditches daily and noticed some orange bacteria-type growth in the ditches and is concerned.  Matt M. went out to inspect the ditch. He found that the issue is naturally occurring iron bacteria.

2/21/2020	2/21/2020	other - During a neighboring source control walkthru.	No - cleaned up before reached MS4	26401 79th Avenue South, Kent, Wa	Food-related oil/grease	Food-related business	Clean-up Education/technical assistance	Prism # 625-023
3/5/2020	3/5/2020	ERTS referral	No - none found	18119 East Valley Hwy, Kent, Wa	Firefighting foam Other - Burned garbage debris	Other - Garbage fire on garbage truck.	Clean-up	Republic Services (RS) had a garbage fire that they dumped onto ground Fire responded with ~10gal water. Less than 1gal entered CB. RS called a contractor to clean up the mess and the drains that were affected. Staff confirmed it did not reach MS4.
3/12/2020	3/12/2020	Construction Inspection	Other - Unknown if discharged to Creek	At the intersection of Interurban Trl & South 228th Street, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up Add or modify operational source control BMP	ERTS #697131 Construction Machinery tipped over spilling into a drainage ditch that goes into Mill Creek. Construction Company contracted by Kent. Booms and Absorbent material used to cleanup site as much as possible, not known if it went to the creek.
3/12/2020	3/12/2020	Pollution hotline (phone, web, app)	No - none found	6838 South 190th Street, Kent, Wa	Sewage/septage/pet waste/human waste	Other commercial/industrial activity	Clean-up	When leaving work tonight it appeared there was sewage leaking from multiple places in the parking lot. Possibly reported by neighboring business Metropolitan Gymnastics as they had active clientele with children using the parking lot. A work order has been placed with Matt McCullough under W045736. Matt has made a note in the Work Order that the Property Manager had the spill cleaned up by Clean Harbor and no waste entered into the drainage system.
3/13/2020	3/13/2020	Staff referral	No - cleaned up before reached MS4	Taco Time NW 1302 West Meeker Street, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle collision	Clean-up	PD reported a collision in front of the Taco Time with oil leakage. Incident #KP200018763 / WebQA Reference #W045743 Staff on-site found that the CB's were protected, the oil was contained, and with the rain they wouldn't need a sweeper.

3/19/2020	3/20/2020	Pollution hotline (phone, web, app)	Unknown	23662 104th Avenue Southeast, Kent, Wa	Food-related oil/grease	Food-related business	Clean-up Education/technical assistance Add or modify operational source control BMP	WebQA #WO45783 Customer noticed the small drive thru coffee shop (McLendons parking lot) dumped waste water into the CBs. Staff on-site informed the owner that it needs to be cleaned and is a violation of Code Chapter 7.14. They also need a grease trap.
3/30/2020	3/30/2020	Direct report to your staff	No - cleaned up before reached MS4	835 Central Avenue North, Kent, Wa (Parking Lot)	Fuel and/or vehicle related fluids	Other accident/spill Other - Theft – punctured fuel tank on box truck	Clean-up Education/technical assistance	Reported by Fire Dept. WebQA: W045819-033020 ERTS #697435. Someone attempted to siphon fuel from a parked vehicle and spilled. Some entered a private CB. Staff notified the property manager, and they hired a contractor to clean the system.
3/31/2020	4/1/2020	Pollution hotline (phone, web, app)	No - none found	11409 Southeast 228th place, Kent, Wa	Fuel and/or vehicle related fluids	Other - Resident is parking their vehicle on the roadway and it leaks.	Education/technical assistance	WebQA # W045838 Resident reported that 11409 has a car parked on the road that's leaking oil into the road/CBs. Staff on-site found the structure was clean and didn't need any absorbent material. Staff sent the vehicle owner educational materials.
4/5/2020	4/20/2020	Pollution hotline (phone, web, app)	Other - RV Gray water discharged to grass probably 50-100 yards from creek. Potential to reach creek but highly unlikely.	13028 Southeast 237th Court, Kent, Wa	Other wastewater - RV gray water	Intentional dumping	Education/technical assistance enforcement other	RV dumping gray water on private property (back yard) near creek buffer. Resident was educated about the illicit discharge and instructed to stop the discharge immediately. In addition, Code Enforcement is sending a letter on 4/20 giving them two weeks to cease inhabiting RV on residential property or they will be cited.
4/24/2020	4/24/2020	ERTS referral	No - none found	Holiday of Kent Project 25035 104th Avenue Southeast, Kent, Wa	Sediment/soil	Construction activity	Clean-up Add or modify structural source control BMP	Clear Water Services reported a turbidity reading "pegged the meter" at greater than 1000 NTU. Staff spoke with contractor and inspected site. Discharge due to temporarily removed silt fence. No discharge to MS4. Silt fence has been reinstalled.

4/24/2020	4/24/2020	ERTS referral	No - cleaned up before reached MS4	1110 West Meeker Street, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle-related business	Clean-up	ERTS #700079 10-12 gal. diesel fuel spill to concrete at a Safeway gas station. Patron didn't realize their gas tank had a hole in it and filled it and it began leaking when tank was half full. Absorbents were applied to the spill. Related ERTS #701554
4/24/2020	4/24/2020	Pollution hotline (phone, web, app)	Unknown	Wetland area North of Southeast 296th Place between 118th Avenue Southeast & 120th Avenue, Kent, Wa	Paint Other - Old Paint Cans Water bottles general trash	Construction activity	Clean-up	Danielle called to inform staff about a large amount of construction trash in the wetland area North of SE 296th Pl between 118th Ave SE & 120th Ave SE. Potential cause - builders/subcontractors dumping materials from the new homes being built nearby.
5/4/2020	5/4/2020	ERTS referral	Yes - notified DOH and Ecology	Federal Way Link Extension Project 23427 30th Avenue South, Kent, Wa	Sediment/soil	Construction activity	Clean-up Education/technical assistance Add or modify operational source control BMP	WAR307947 Dust control water during demolition was applied. They used too much, and 2gal of runoff entered CB.CB was vectored. Water truck operator was "recalibrated". <a href="https://KENTWA.mycusthelpadmin.com/webapp/zadmin/ServiceRequests/Details.aspx?id=46088">https://KENTWA.mycusthelpadmin.com/webapp/zadmin/ServiceRequests/Details.aspx?id=46088</a>
5/4/2020	5/14/2020	Staff referral	No - none found	Dominis Stone 22425 72nd Avenue South, Kent, Wa	Other wastewater	Intentional dumping/illegal	Clean-up Education/technical assistance Referred to other agency or department/agency	WebQA # ERTS Incident #698216 Reporting Party Information Name: Luke Larson Phone: 253-856-5600 Email: Llarson@kentwa.gov
5/5/2020	5/6/2020	Other agency referral	No - cleaned up before reached MS4	20600 108th Avenue Southeast, Kent, Wa	Paint	Intentional dumping	Clean-up Education/technical assistance	IDDE Report has no more information besides what was provided. Unsure of WebQA number.



6/8/2020	6/9/2020	ERTS referral	No - cleaned up before reached MS4	21002 68th Avenue South, Kent, Wa	Other - Corrosive material	Other commercial/industrial activity Other - Leaking Container	Clean-up	This spill was cleaned up and verified by the State Emergency Operations Officer. The spill did not enter the drainage system.
6/9/2020	6/9/2020	ERTS referral	No - none found	19014 64th Avenue South, Kent, Wa	Solid waste/trash	Other - Dumpster Fire	Clean-up	Fire department responded and released about 100 gallons of fire fighting water that went into dumpster then overflowed into storm drain. Our inspectors went out to check the system. Staff found it was contained to the dumpster, nothing entered MS4.
6/15/2020	6/16/2020	Other agency referral - Valley Com/Fire Department	No - none found	7499 South 259th Street, Kent, Wa	Other - Natural organic material	Other - Natural occurrence	Other - Fire dept. used a boom across the river for testing at DOE's recommendation. They didn't want to use their "good" rope so staff went to replace the rope, but DOE determined the sheen wasn't petroleum based.	Kent Fire #20-12613 / WebQA Reference #W046499 Chris Couvillion responded to after hours call out at 18:41 Email from Chris Couvillion to Laura Haren  Sheen seen in river was not petroleum based. Nothing entered MS4 or state waters.
6/16/2020	6/16/2020	ERTS referral	No - cleaned up before reached MS4	20427 87th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Other - Attempted fuel stealing	Clean-up	A Penske truck had a hole punched into the tank to steal fuel. 20-30 gals spilled. No more than 5 gals entered into the private storm system. Staff tracked the sheen to 5 CBs downstream. Penske called Clean Harbors and Pro-Vac to clean up. EPA approved.

6/16/2020	6/16/2020	Staff referral	Yes - notified Ecology	22043 129th Place Southeast, Kent, WA	Fuel and/or vehicle related fluids	Other - Shed fire	Clean-up	Staff found a vehicle parked near a CB that was leaking oil. They placed hydrophobic pads in the CBs and applied Greasweep. PD had the vehicle towed. After it was towed, staff cleaned up the Greasweep and pulled out the pads. There was no oil left.
6/16/2020	6/16/2020	Staff referral	No - cleaned up before reached MS4	At the intersection of 68th Avenue South and South 212th Street, Kent, Wa	Fuel and/or other vehicle related fluids	Vehicle collision Other - Leaking Vehicle	Clean-up	Referred by Kent PD. WebQA# W046507 A semi vs sedan collision at the intersection. A large quantity of oil leaked over the eastbound on 212th. Case number: 20-7776. Put down Greasweep for the oil, and then called a sweeper to clean it all up.
6/21/2020	6/21/2020	Other agency referral - Buck Smith with WA Dept. of Ecology	Yes - notified Ecology	25812 110th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids Firefighting foam	Other - Four vehicle fire	Clean-up	Vehicle fires ERTs #698959 WebQA Reference #W04655  Fire Dept. says foam and about 20 gallons of gasoline have gone through the storm drains. Staff worked with the property manager to get a cleaning company out to clean up the private drainage system. Staff and Fire put in booms and spill absorbent materials in all structures. Only trace amounts of fire fighting foam entered in MS4.
6/22/2020	6/22/2020	Staff referral	No - cleaned up before reached MS4	21601 76th Avenue South, Kent, Wa	Fuel and/or other vehicle related fluids	Unconfirmed, unspecified, or not identified	Clean-up	Phil McConnell called about oil in the raised cross walk. He also said that the car continued to drive and leak - small oil trail continued north. Staff responded and found that it was very minor. They used absorbent pads to clean up what they could.
6/30/2020	6/30/2020	Staff referral	No - cleaned up before reached MS4	At the intersection of Southeast 208th street and 132nd Avenue Southeast, Kent, Wa	Other - Hydraulic Fluid	Other - Leaking Machinery	Clean-up	WebQA# W046590 Officer called in a disabled truck with machinery leaking. KPD# 2000447. Staff responded. Spill was 4 feet by 80 feet surface area, none entered into our system. Used Greasweep and called a street sweeper. Hansen work order number 627238.

7/6/2020	2/6/2020	Other agency referral - Puget Sound Fire and ERTS # 699235	Yes - notified Ecology	At the intersection of East James Street & Summit Avenue North, Kent, Wa	Fuel and/or other vehicle related fluids	Vehicle collision	Clean-up	Kent PD Case #20-8606 / WebQA Reference #W046705 Motor Vehicle Accident. Hydraulic fluid spilled into CB. Garbage truck company put down absorbent material/pads. Staff swept and cleaned everything. NRC was called to clean out the CB. Work order: 627907.
7/7/2020	8/14/2020	other - FloHawk (contractor)	No - none found	10225 Southeast 256th Street, Kent, Wa	Food-related oil/grease	Food-related business	Clean-up Enforcement	627-011 / Spills/Hazardous Dumping (W046696-070620) Owner responded and had system cleaned however the contractor did a poor job. Sent CN and the contractor has been communicated. AAA septic said all work would be completed 7/14/2020.
7/9/2020	7/9/2020	Business inspection - FloHawk (contractor)	No - none found	25633 102nd Place Southeast, Kent, Wa	Food-related oil/greaseSolid waste/trash	Food-related business	Clean-up	1 drain with pollution elbow was impacted by improper disposal out the back door. Prism #627-008
7/28/2020	8/17/2020	Staff referral	No - cleaned up before reached MS4	21840 76th Avenue South, Kent, Wa	Unconfirmed, unspecified, or not identified	Unconfirmed, unspecified, or not identified	Clean-up Education/technical assistance	ERTS # or WebQA # Notes in Prism (612-058)
7/28/2020	7/28/2020	Pollution hotline (phone, web, app)	No - none found	At the intersection of 98th Avenue South and South 237th Place, Kent, Wa	Unconfirmed, unspecified, or not identified	Unconfirmed, unspecified, or not identified	Other - Nothing found to eliminate	WebQA #W046945-072820  States that she noticed a black sedan speed past her when walking her dogs and saw a male driver dump something and walked past and smelled an odor. she said it was the CB one in from the dead end. Marcus responded and couldn't find anything suspicious and no evidence of anything toxic dumped. Possibly rotten fruit from a nearby fruit tree. There is no discoloration around the CB's or any liquid that is noticeable other than water.

7/30/2020	8/3/2020	ERTS referral	No - none found	24014 116th Avenue Southeast, Kent, Wa	Fuel and/or other vehicle related fluids	Vehicle-related business	Clean-up	A customer drove off while refueling at the Arco Station. Estimated 8.5 gals was released to the pavement. Most was captured onsite in oil-water separator. Absorbent was applied to what remains. Kim MEDICUS is coordinating to hire a contractor.
7/30/2020	7/30/2020	Staff referral	No - cleaned up before reached MS4	711 Washington Avenue North, Kent, Wa	Fuel and/or other vehicle related fluids	Mobile business	Education/technical assistance Add or modify treatment BMP	ERTS # or WebQA #
7/31/2020	8/4/2020	Business inspection	No - none found	25611 104th Avenue Southeast, Kent, Wa	Food-related oil/grease Solid waste/trash Sewage/septage/pet waste/human waste soap or cleaning chemicals other - sharps	Intentional dumping	Clean-up	Prism 627-064 – Spoke with PM and she is all over it. Admonishment expiration date is 9/10/2020.
7/31/2020	7/31/2020	Direct report to your staff	Unknown	At the intersection of South 259th Street & 3rd Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Unconfirmed, unspecified, or not identified	Clean-up Education/technical assistance	Staff reported a white plastic 50 gal. Oil barrel that was next to the pond and some had leaked into the soil. WebQA - W046967 - Dylan call is responding, called out at 7:22 am Grease sweep was laid and cleaned. Spill was small and contained.
8/4/2020	8/6/2020	Other agency referral	No - none found	Mill CreekAt the intersection of South 204th Street & 72nd Avenue South. Kent, Wa	Unconfirmed, unspecified, or not identified	Unconfirmed, unspecified, or not identified	Referred to other agency or department - Drainage Dist. 1	Construction activity deemed to be unlikely cause, referred to COK NPDES Business Inspector who inspected private drainage systems in the area and no source was found. Larry C. from Drainage Dist. 1 thinks that it was from a beaver dam.

8/14/2020	8/14/2020	Construction Inspection	Yes - notified Ecology	26706 132nd Avenue Southeast, Kent, Wa (Morford Short Plat)	Sediment/soil	Construction activity	Education/technical assistance Add or modify operational source control BMP	No ERTS # or WebQA # assigned to the IDDE report. Unsure of what exactly happened.
9/2/2020	9/3/2020	ERTS referral	No - cleaned up before reached MS4	25440 Pacific Hwy South, Kent, Wa	Fuel and/or vehicle related fluids	Intentional dumping	Clean-up Education/technical assistance	ERTS # or WebQA # ERTS Incident #700409
9/10/2020	9/10/2020	ERTS referral	No - cleaned up before reached MS4	8220 South 212th Street, Kent, Wa	unconfirmed, unspecified, or not identified - foam	Other - Vehicle Fire	Clean-up Education/technical assistance	ERTS # or WebQA # ERTS Incident #700569
10/2/2020	10/5/2020	ERTS referral	No - none found	21840 76th Avenue South, Kent, Wa (Mill Creek Distribution Center Bld. 2 & 3.)	Fuel and/or vehicle related fluids	Vehicle collision	Clean-up Education/technical assistance	ERTS # or WebQA # ERTS Incident #701032
10/2/2020	10/2/2020	ERTS referral	No - none found	7911 South 188th Street, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up	ERTS # 701832 About 1-2 gal. of a metal-working fluid (DasCool2357) was spilled. Staff spoke to the property manager and they had MSI clean the site and CBs. Spill caused by a semi backing into another semi. It was contained and didn't enter MS4.
10/5/2020	10/5/2020	ERTS referral	No - none found	11101 Southeast 208th Street, Kent, Wa	Paint	Construction activity	Clean-up Education/technical assistance	ERTS #701067. No paint reached the storm drain, only visual trail on pavement and it was dry by the time I responded

10/14/2020	10/14/2020	Staff referral	other - Contained in Control Structure.	At the intersection of 111th Avenue Southeast and Southeast 251st Place, Kent, Wa	Fuel and/or vehicle related fluids	Unconfirmed, unspecified, or not identified	Clean-up	Joe Craft was cleaning CBs and line in the area and came across a CB and noticed an extremely strong fuel/oil smell. Joe cleaned the CBs and lines downstream from that, and NRC came out and cleaned it. Staff was unable to find the source of the oil/fuel, could possibly be from dumping or a collection over time. The structure is downstream from a pond that was recently cleaned out, and nothing was found in the pond. It was cleaned up and closed out.
10/27/2020	10/27/2020	Staff referral	No - cleaned up before reached MS4	At the intersection of Clark Avenue North & East James Street, Kent, Wa	Paint	Other accident/spill	Clean-up	<a href="https://see.clickfix.com/issues/8827627">https://see.clickfix.com/issues/8827627</a> Report #20-13631 Paint spill on middle lane. Sgt Bishop responded and PD Records called into PW Op for clean up. Did not enter MS4. Sweeper coming out and will need to figure out other ways to remove from roadway.
10/28/2020	10/29/2020	ERTS referral	No - cleaned up before reached MS4	1110 West Meeker Street, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle-related business	Clean-up	ERTS # 701554 Patron filled their vehicle at gas station, but a hole in the line caused ~10 gal. of gas to be spilled. Staff used kitty litter and 3 boom pads and FM186. Spill entered a CB that goes to an OWS then sanitary. Inspectors checked OWS.
11/4/2020	11/5/2020	ERTS referral	No - none found	21005 64th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up Education/technical assistance	ERTS #701690 DIESEL FUEL SPILLED FROM A CUP THAT WAS ACCIDENTALLY DROPPED. Staff followed up on this incident at Amazon. They contained the spill and cleaned it up. No contaminants reached the waters of the state or the municipalities system. Thanks
11/13/2020	11/13/2020	Staff referral	Yes - notified Ecology	22720 101st Place Southeast, Kent, Wa	watewater other	Illicit connection	Education/technical assistance Enforcement Referred to other agency or department	City of Kent staff are working to contact the property owner to resolve the connection. A correction notice will be sent to the homeowner.  Four of the six lots potential source lots were tested, and they will attempt to test the other two on Monday.

11/16/2020	11/16/2020	Staff referral	No - cleaned up before reached MS4	1216 4th Avenue North, Kent, Wa	Paint	Unconfirmed, unspecified, or not identified	Clean-up	SeeClickFix # 8921679 Staff responded and found a paint can that spilled a little. They contained it and used absorbent material, but there was still a slick so they put down more absorbent and a street sweeper hit the location. Work order 634207.
11/16/2020	11/16/2020	ERTS referral	No - none found	21005 64th Avenue South, Kent, Wa	Fuel and/or vehicle related fluids	Other accident/spill	Clean-up Education/technical assistance	ERTS#701936
11/30/2020	11/30/2020	Pollution hotline (phone, web, app)	No - cleaned up before reached MS4	At the intersection of 104th Avenue Southeast & Southeast 236th Street, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle collision	Clean-up	SeeClickFix # 8984747Staff found that all four lanes and middle lane had oil/coolant from a Ford Ranger that was struck by a Metro Bus. No material entered MS4. Greasweep was put on affected area and a street sweeper was called. Work order 634949.
12/8/2020	12/10/2020	ERTS referral	No - none found	24014 116TH Avenue Southeast, Kent, Wa	Fuel and/or vehicle related fluids	Vehicle-related business	Clean-up	ERTS #702341 I visited the site yesterday and found no residual fuel/sheen anywhere on the surface or in their private drainage system. Pump was still out of service and taped off. All spill material had been cleaned up as well.
12/21/2020	12/31/2020	ERTS referral	No - cleaned up before reached MS4	21854 76th Avenue South, Kent, Wa	Fuel and/or other vehicle related fluids	Vehicle collision	Clean-up Education/technical assistance	Spill in parking lot between the building at 21854 at the Republic Services location for multiple weeks. Oil is visibly running into a drain in the parking lot with the current rain falls. Staff contained, and it was cleaned up by a contractor.
12/30/2020	12/30/2020	Pollution hotline (phone, web, app)	No - cleaned up before reached MS4	3rd Avenue North and 2nd Avenue North, Kent, Wa	Fuel and/or vehicle related fluids	Unconfirmed, unspecified, or not identified	Clean-up	SeeClickFix#9125272 Staff responded and found that there was roughly a gallon of oil that had been dumped in the alley. No oil got into CBs. Staff used Greasweep to absorb the oil, sweep it up, and properly disposed of. The work order is 636120.

12/30/2020	12/30/2020	Staff referral	Yes - notified Ecology	11315 Southeast 244th Street, Kent, Wa	Sediment/soil	Construction activity	Clean-up Education/technical assistance Add or modify operational source control BMP Add or modify structural source control BMP	ERTS # 702811 Report of 10k gals of water discharged from the site. Site has experienced repeated non-compliant discharges. The implementation of the additional measures discussed during the meeting should remedy the problems.
12/30/2020	12/30/2020	Direct report to your staff	Yes - allowable or conditionally allowable	1220 2nd Avenue North, Kent, Wa	Firefighting foam other - debris from fire	Other - Shed fire		SeeClickFix # 9122857 Foam and debris from fire washed into storm system. Contaminates were contained to site. Contractor (U.S. Ecology) not ecology cleaned the area. Site manager (Nick) said that the work is completed and will be sending an invoice.



## City of Kent 2020 Annual Report Question #69a

- [Appendix 1 of the permit](#)
- Washington State Department of Agriculture's Noxious Weed Control NPDES Permit
- [2017 City of Kent Surface Water Design Manual](#)
- City of Kent Public Works Operations Standard Operating Procedures
- [Regional Road Maintenance Endangered Species Act Program guidelines](#)
- [KCC chapter 7.14, Illicit Discharges](#)

## City of Kent 2020 Annual Report Question #77

### S5.C.8 – SOURCE CONTROL PROGRAM

#### **S5.C.8.b.ii**

The City of Kent has already established an inventory of all publicly and privately owned institutional, commercial, and industrial sites within Kent's jurisdiction. City staff researched the facilities in this inventory to determine which of these sites have the potential to generate pollutants to the MS4 and therefore need to be included in our Source Control Program. Staff are also evaluated other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites. The total number of sites found to be potential pollutant generating facilities is 1,118.

#### **S5.C.8.b.iii**

City of Kent staff are working on developing education and outreach materials to inform facilities included in our Source Control Program about activities that may generate pollutants as well as requirements applicable to those activities. We are working with a consultant who is developing posters and brochures to inform about the use of source control BMPs that will also be translated into other languages spoken in the Kent community. Our database already contains addresses, email addresses and phone numbers for these facilities so we will have options for how we will deliver these materials. We will be delivering this information in person with each site inspection as well.

Kent is working with other jurisdictions to develop these education and outreach materials as well as other program elements. The group is called the Business Inspection Group (BIG).

The city is working with other jurisdictions on a regional behavioral change campaign to encourage the closing of dumpster lids to prevent the illicit discharge of pollutants to the drainage system from leaking dumpsters. This group is called the Dumpster Outreach Group (DOG). The materials developed from this campaign will be used as a component of our Source Control Program as well.

#### **S5.C.8.b.iv**

The City of Kent has already developed a system of progressive enforcement to implement if an inspector determines through inspections or otherwise, that a site has failed to adequately implement required BMPs. This progressive enforcement includes a Correction Notice, Admonishment Letter and a Notice of Violation. These steps include phone calls, emails, and follow-up inspections.

The City of Kent already has an established database to maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance.

The City of Kent is currently working on updates to our stormwater code, KCC 7.05. The updates will consist of the language needed to support the source control program requirements. These updates have been submitted to our legal staff for review. This updated code will be brought before city council for adoption in 2021.

